

# LINK LIGHT RAIL OPERATIONS AND MAINTENANCE SATELLITE FACILITY

DRAFT ENVIRONMENTAL IMPACT STATEMENT

**APPENDIX E.4**

**Historic and Archaeological Resources Technical Report**



**May 2014**



CENTRAL PUGET SOUND  
REGIONAL TRANSIT AUTHORITY





# **SOUND TRANSIT LINK OPERATIONS AND MAINTENANCE SATELLITE FACILITY HISTORIC AND ARCHAEOLOGICAL RESOURCES TECHNICAL REPORT**

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## Acronyms and Abbreviations

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BP	before present
DAHP	Washington State Department of Archaeology and Historic Preservation
Forest Street OMF	Forest Street Operations and Maintenance Facility
LRVs	light rail vehicles
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
OMSF	Operations and Maintenance Satellite Facility
SHPO	State Historic Preservation Officer
ST2	Sound Transit 2: A Mass Transit Guide, The Regional Transit System Plan for Central Puget Sound
WHR	Washington Heritage Register



## Project Description

The Sound Transit Board of Directors considered the proposed project's purpose and need, the physical and operational requirements of the OMSF and associated site screening criteria, and scoping comments and suggestions provided by agencies and the public. In December 2012, the Board adopted Motion M2012-82, which identified four different build alternatives for detailed evaluation in this Draft Environmental Impact Statement (EIS). The Draft EIS discusses the potential environmental impacts that may result from construction and operation of the proposed project under each of these build alternatives. In addition, the potential environmental impacts that may result from the No Build Alternative, the conditions that would exist if the proposed project were not implemented, are also discussed to provide a baseline for comparing the potential impacts of the build alternatives.

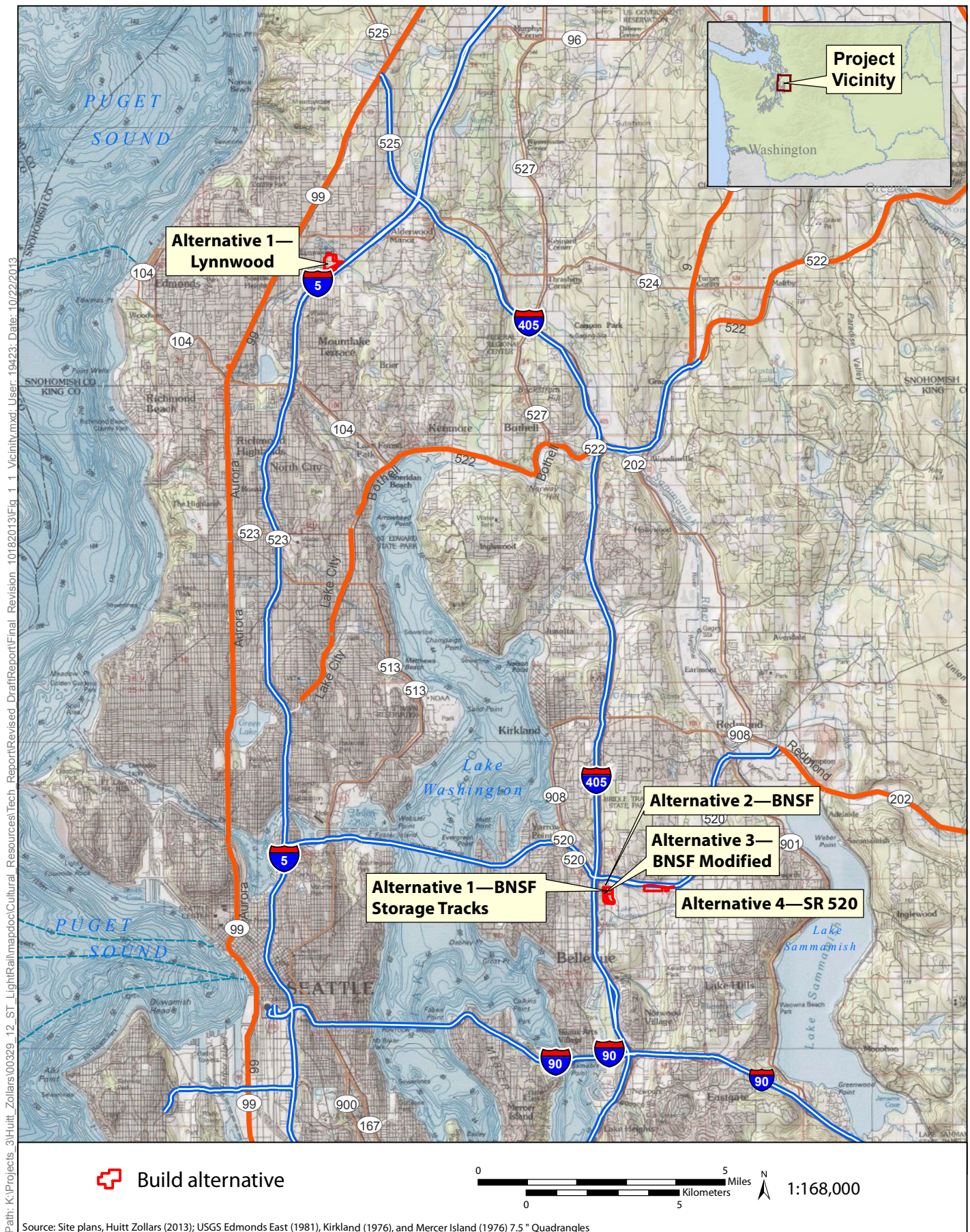
Three of the four build alternatives would include alterations to the Eastside Rail Corridor of south of SR 520 and north of NE 12th Street in the City of Bellevue. The Eastside Rail Corridor is "railbanked," which permits interim trail use (and other compatible uses) of the right-of-way while keeping the right-of-way available for reactivation of freight rail service in the future. Sound Transit now owns this portion of the Eastside Rail Corridor subject to King County's trail easement and reactivation rights.

The project vicinity is shown in Figure 1-1.

## No Build Alternative

Under the No Build Alternative, an OMSF would not be built. The operations and maintenance support needs for the existing and currently planned and funded Link light rail system would be served by the Forest Street OMF south of downtown Seattle. The OMF has the capacity to maintain up to 104 LRVs, 76 fewer than the minimum number of LRVs needed to operate the system at planned service levels.





**Figure 1-1: Project Vicinity**  
Sound Transit Link Light Rail OMSF Cultural Resources Technical Report



## Build Alternatives

### Lynnwood Alternative

Under the Lynnwood Alternative, Sound Transit would construct the OMSF north of I-5 and east of 52nd Avenue/ W Cedar Valley Road in the City of Lynnwood. The OMSF footprint for the Lynnwood Alternative would require approximately 24 acres of land for all three design options. Approximately 37 to 41 acres would need to be acquired, given existing parcel boundaries, leaving approximately 9 to 13 acres for redevelopment.

The proposed Lynnwood Link Extension alignment alternatives being evaluated in the *Lynnwood Link Extension Draft EIS* (Sound Transit 2013) are located along the Lynnwood Alternative site for the OMSF. A Lynnwood Link Extension preferred alternative has yet to be identified; therefore, the Lynnwood Alternative for the OMSF includes three design options, each connecting to one of the three build alternatives being evaluated in the *Lynnwood Link Extension Draft EIS* (Sound Transit 2013). Design Option C1 would include lead track connecting to Lynnwood Link Extension Alternative C1, Design Option C2 would include lead track connecting to Lynnwood Link Extension Alternative C2, and Design Option C3 would include lead track connecting to Lynnwood Link Extension Alternative C3.

### BNSF Alternative

Under the BNSF Alternative, Sound Transit would construct the OMSF on property located between the Eastside Rail Corridor on the west and 120th Avenue NE on the east, south of SR 520 and north of NE 12th Street in the City of Bellevue. This site is approximately 27 acres, including 2 acres of the Eastside Rail Corridor now under Sound Transit ownership, and is located along the adopted East Link revenue line northwest of the 120th Avenue NE station. The OMSF development footprint on the site is approximately 23 acres leaving approximately 4 acres for redevelopment. Infrastructure for the proposed project would occupy most of the site leaving the southern portion available for other development.

### BNSF Modified Alternative

Under the BNSF Modified Alternative, Sound Transit would construct the OMSF on both sides of the Eastside Rail Corridor off of 120th Avenue NE on the east, south of SR 520 and north of NE 12th Street in the City of Bellevue. This site is located along the adopted East Link revenue line and is approximately 34 acres, including 2 acres of Eastside Rail Corridor now under Sound Transit ownership. The OMSF development footprint on the site is approximately 24 acres leaving approximately 8 acres for future redevelopment. The storage tracks would be located on the western portion of the site, west of the rail corridor. Other OMSF facilities would be located adjacent to the east side of the rail corridor, leaving the frontage area along 120th Avenue NE available for other development. The design acknowledges the railbanked status of the Eastside Rail Corridor by allowing sufficient width and vertical clearances to accommodate a future trail and future freight or passenger rail use of the corridor.

### SR 520 Alternative

Under the SR 520 Alternative, Sound Transit would construct the OMSF south of SR 520 and north of Northup Way/NE 20th Street, east of 130th Avenue NE and west of 140th Avenue NE in the City of

Bellevue. This site is located along the adopted East Link revenue line and is approximately 25 acres with the OMSF development footprint encompassing the entire site. Primary access to the site would be directly off of NE 20th Street west of 136th Place NE. The configuration of buildings under this alternative would vary from the other alternatives in that the operations offices would be in a separate building to the west of the LRV maintenance shops, and the LRV covered wash and service bay would be in a separate building east of the LRV maintenance shops.

## Personnel

Christopher Hetzel, senior architectural historian, served as cultural resources lead for this study and principal investigator for the consideration of historic resources. J. Tait Elder, MA, archaeologist was principal investigator for the consideration of archaeological resources. Melissa Cascella, MA, and Shane Sparks assisted the principal investigators in drafting this cultural resources survey report.

## Area of Potential Effects and Study Area

The cultural resources study area for the proposed project, otherwise known as the Area of Potential Effects (APE), is defined as those areas specific to the proposed project's four discontinuous build alternative sites located in Snohomish County and King County. The vicinity of each build alternative APE is shown in Figures 2-1a, 2-2a, 2-3a, 2-4a, and 2-5a. The sites include the Lynnwood Alternative site, BNSF Alternative site, BNSF Modified Alternative site, and SR 520 Alternative site.

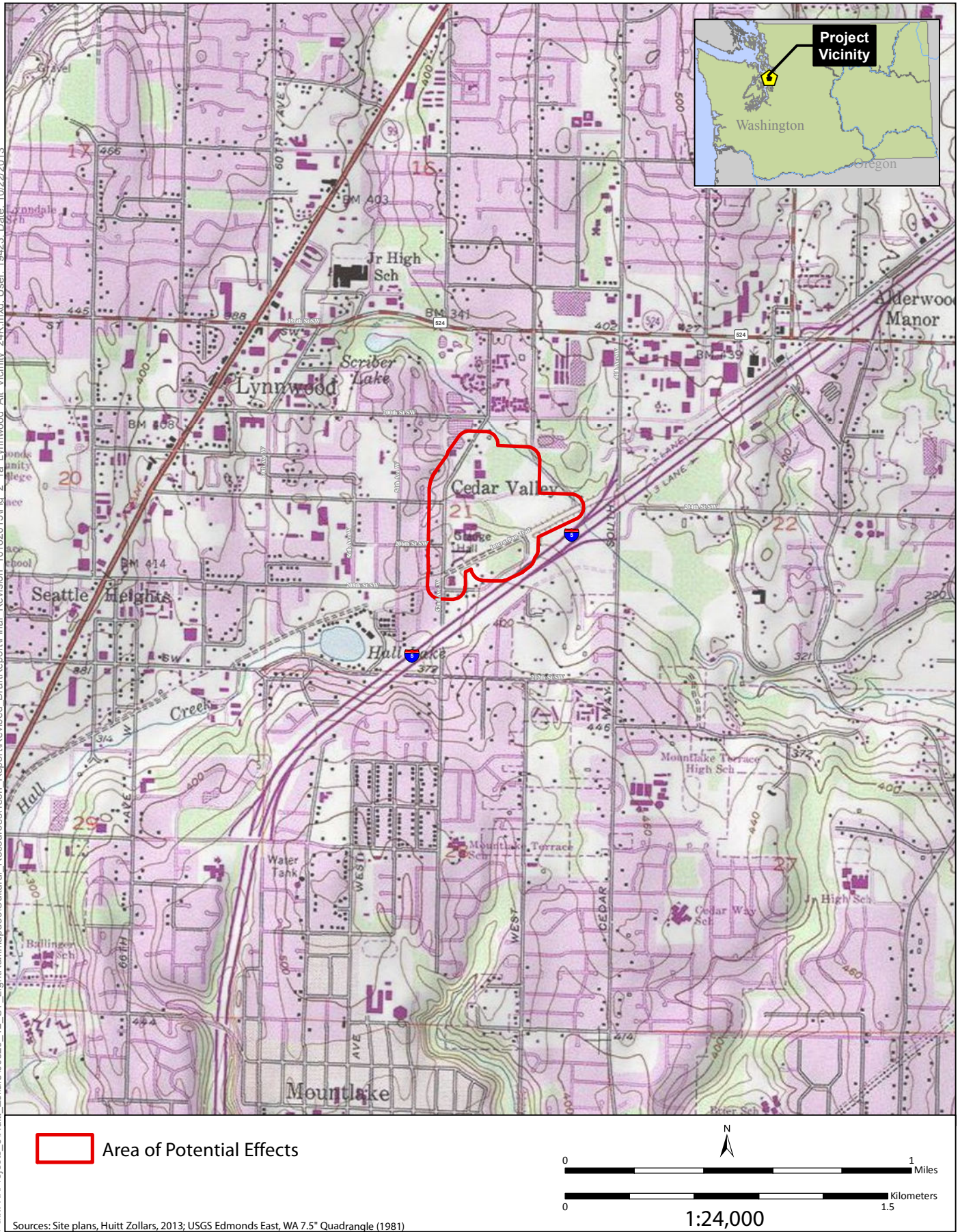
The APE is considered the legal parcels that comprise the footprint each of the four build alternative sites, plus a 200-foot buffer surrounding each build alternative site. This area includes locations of potential ground disturbance at each build alternative site and areas where project activities would be conducted, such as areas for demolition, construction, staging, equipment storage locations, and stormwater management. The depth of potential ground disturbance may vary according to construction practice—deeper for excavation areas and shallower for at-grade construction—and depending on the subsurface limits of known human use or occupation where the project feature occurs. Figures 2-1b, 2-2b, 2-3b, 2-4b, and 2-5b illustrate the APE at each build alternative site.

## Regulatory Context

Federal, state, and local regulations recognize the public's interest in cultural resources and the public benefit of preserving them. These laws and regulations each use different terms to define these resources, and require analysts to consider how a project might affect cultural resources and to take steps to avoid or reduce potential damage to them. A cultural resource can be considered as any property valued (e.g., monetarily, aesthetically, religiously) by a group of people. Valued properties can be historical in character or date to the prehistoric past (i.e., the time prior to written records). Resource types referred to in this report include archaeological resources, historic resources, and culturally significant properties.

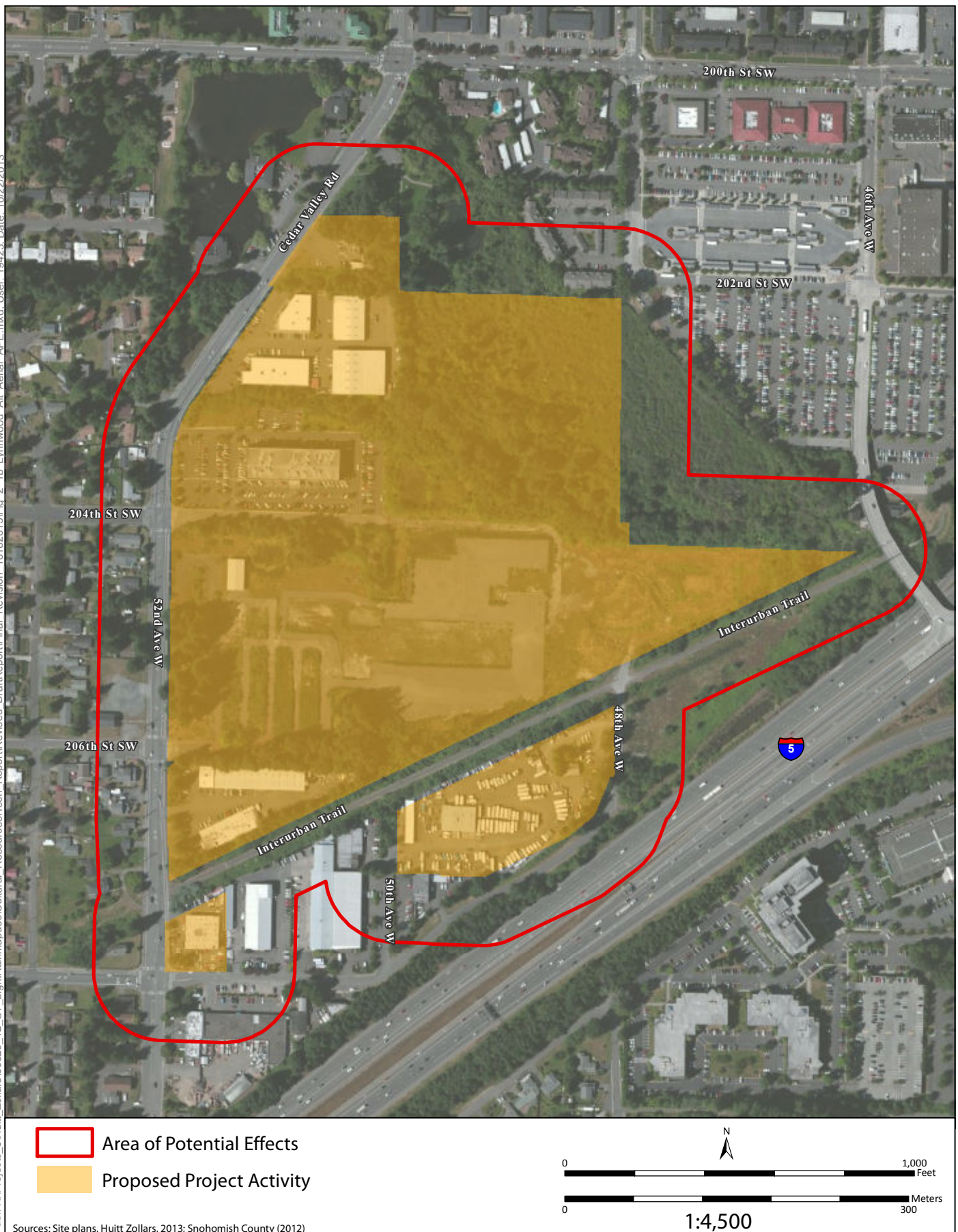


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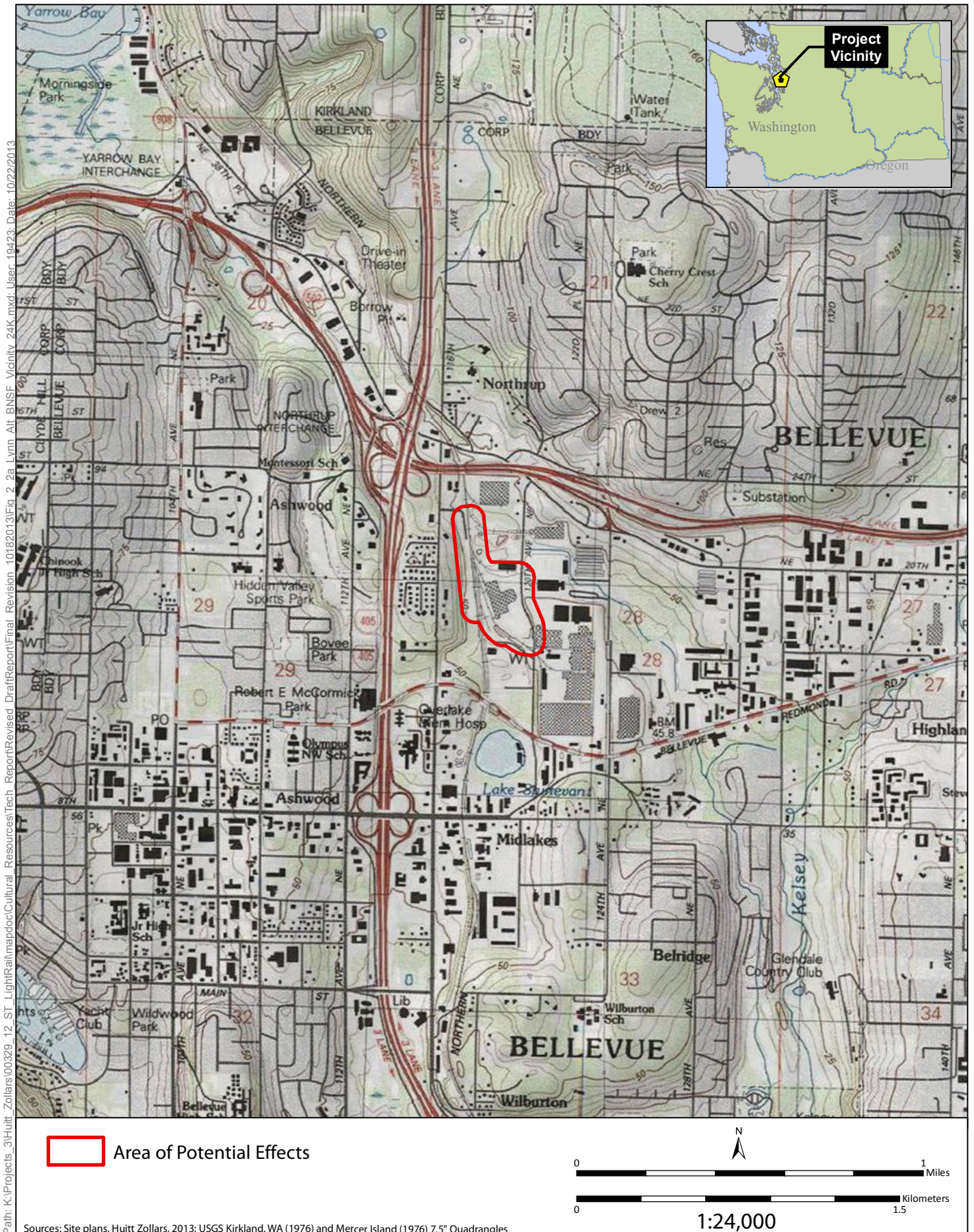
**Figure 2-1a: Lynnwood Alternative—Vicinity**  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report





**Figure 2-1b:** Lynnwood Alternative—Area of Potential Effects  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report





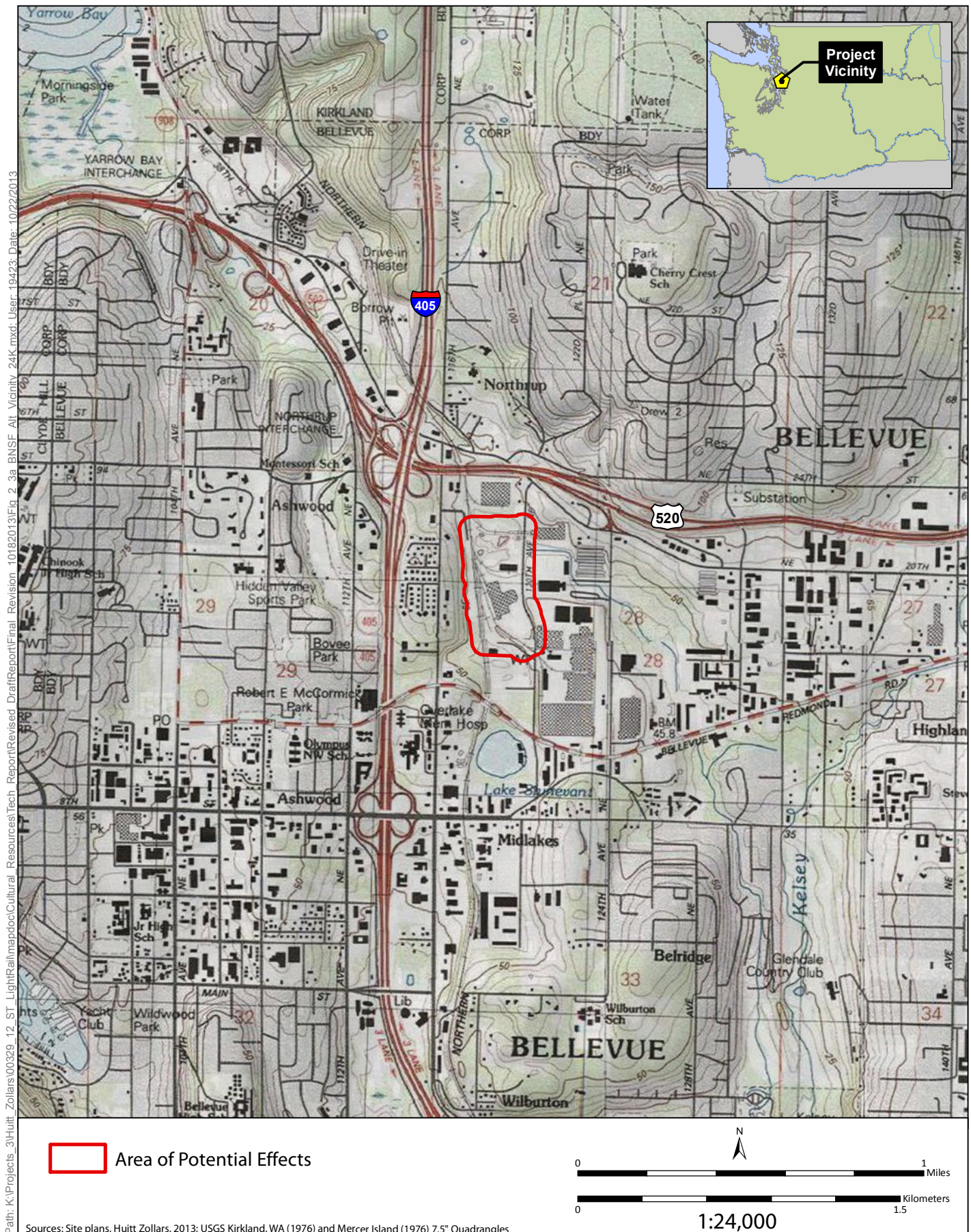
**Figure 2-2a:** Lynnwood Alternative, BNSF Storage Tracks—Vicinity  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report





**Figure 2-2b:** Lynnwood Alternative, BNSF Storage Tracks—Area of Potential Effects  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report





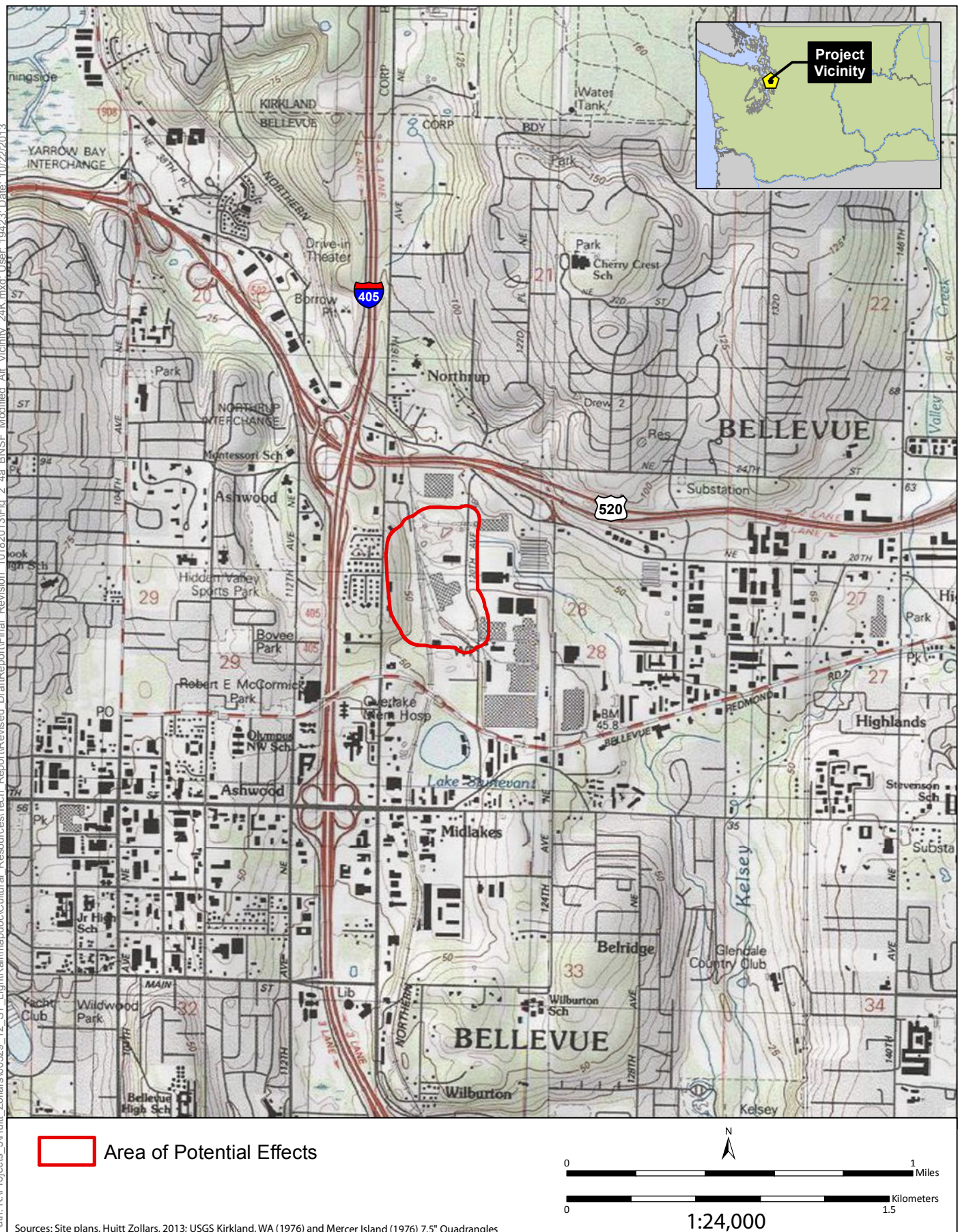
**Figure 2-3a: BNSF Alternative—Vicinity**  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report





**Figure 2-3b: BNSF Alternative—Area of Potential Effects**  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report





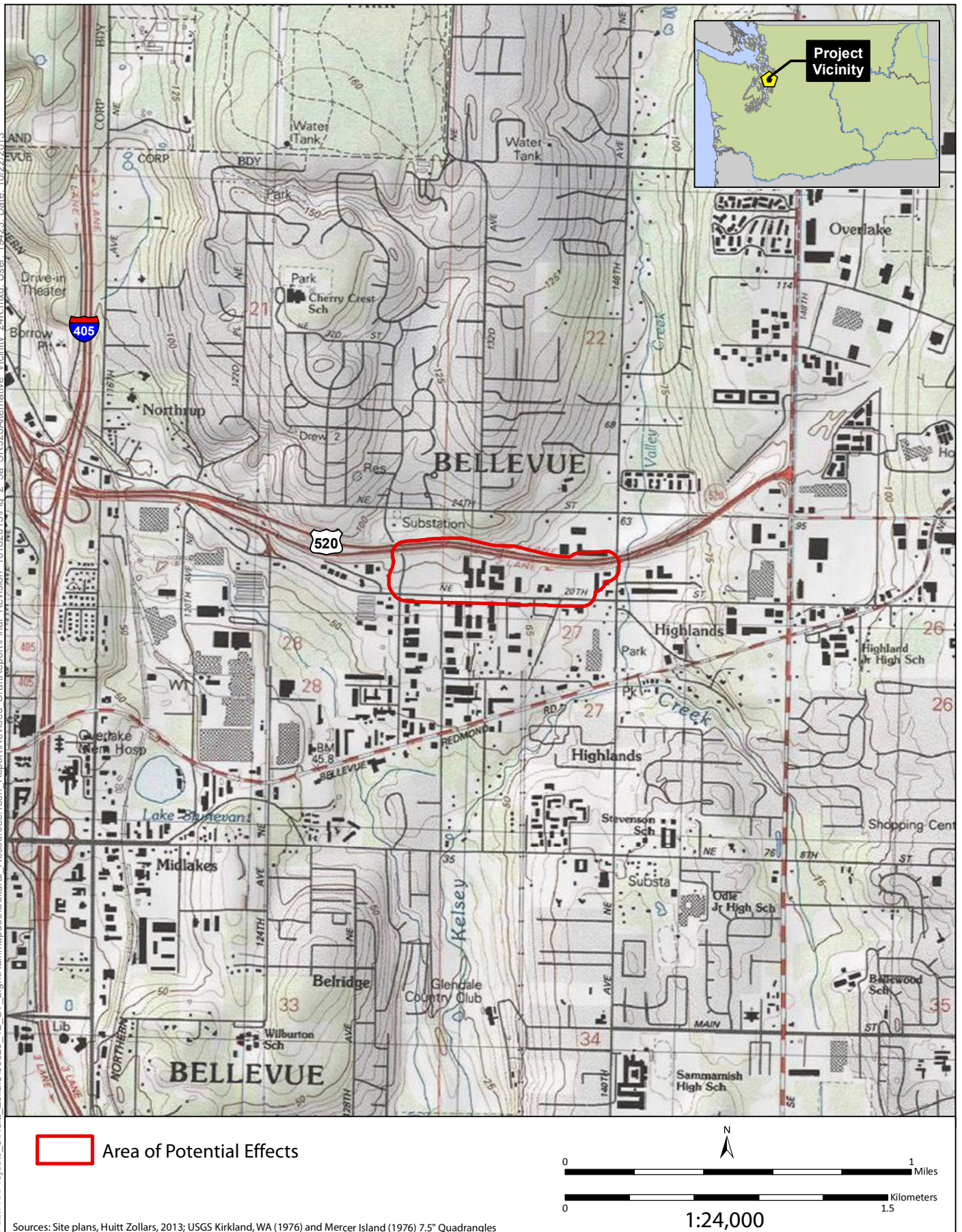
**Figure 2-4a: BNSF Modified Alternative—Vicinity**  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report





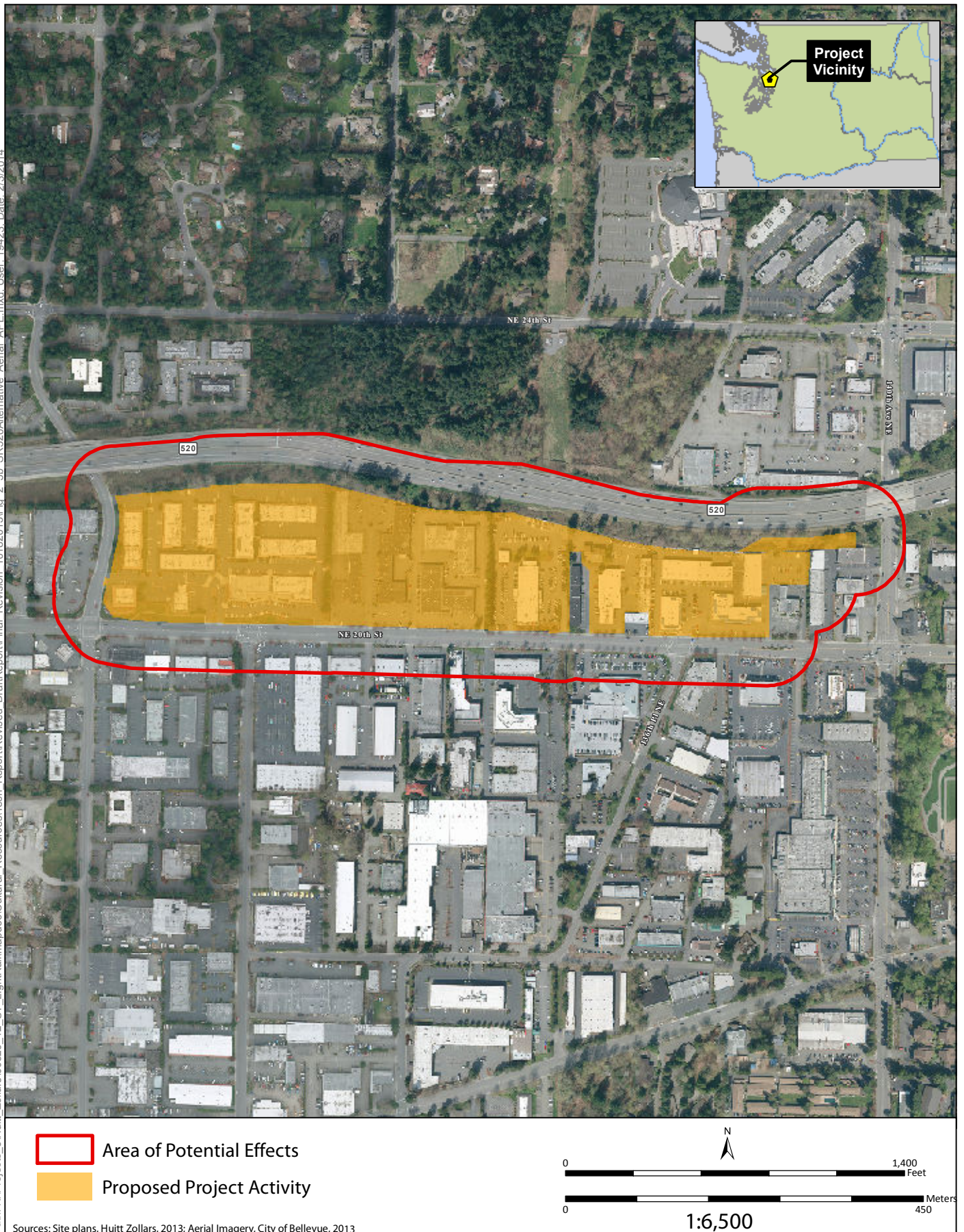
**Figure 2-4b: BNSF Modified Alternative—Area of Potential Effects**  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report





**Figure 2-5a: SR 520 Alternative—Vicinity**  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report





**Figure 2-5b:** SR 520 Alternative—Area of Potential Effects  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report

The proposed project involves federal funding and, therefore, must satisfy the requirements established under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA). The NHPA is the primary mandate governing projects under federal jurisdiction that might affect cultural resources. The purpose of this report is to identify and evaluate cultural resources in the APE, fulfilling the requirements of NEPA and Section 106 of the NHPA, and to assess the potential effects of the proposed project on cultural resources.

## Federal

### National Environmental Policy Act

NEPA requires federal agencies to consider effects that plans and programs may have on important historic, cultural, and natural aspects of our national heritage by considering—among other things—unique characteristics of the geographic area such as proximity to cultural resources (40 Code of Federal Regulations [CFR] 1508.27(b)(3)) and the degree to which actions may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places (NRHP) (40 CFR 1508.27(b)(8)). Although NEPA does not define standards specific to cultural resources impact analyses, the implementing regulations of NEPA (40 CFR 1502.25) state that, to the fullest extent possible, “agencies shall prepare draft environmental impact statements concurrently with and integrated with environmental impact analyses and related surveys and studies required by...the National Historic Preservation Act of 1966 (16 U.S.C. 470 et seq.)...and other environmental review laws and executive orders.”

Although NEPA statutes and implementing regulations do not contain detailed information concerning cultural resource impact analyses, Section 106 of the NHPA, with which NEPA must be coordinated, details standards and processes for such analyses. The implementing regulations of Section 106 states, “Agency officials should ensure that preparation of an environmental assessment (EA) and finding of no significant impact (FONSI) or an EIS and record of decision (ROD) includes appropriate scoping, identification of historic properties, assessment of effects upon them, and consultation leading to resolution of any adverse effects” (36 CFR 800.8[a][3]). Section 106, therefore, typically forms the crux of federal agencies’ NEPA cultural resources impact analyses, although other federal cultural resources regulations must also be considered. Similar processes for the identification, consultation, evaluation, effects assessment, and mitigation of cultural resources are required for both NEPA and Section 106, and compliance should be coordinated and completed simultaneously.

### Section 106 of the National Historic Preservation Act

Section 106 of the NHPA (Pub. L. 88-655, 16 U.S.C §470 et seq.) ensures that federal agencies consider cultural resources in any funded, licensed, or permitted undertaking prior to initiation, and provides the State Historic Preservation Officer (SHPO), affected Native American tribes, and other interested parties an opportunity to comment on these actions. Cultural resources, referred to as “historic properties,” are defined as any prehistoric or historic district, site, building, structure or object that is listed in or eligible for listing in the NRHP.



The Section 106 process is codified in 36 CFR 800 and consists of four steps:

1. Initiation of the process by coordinating with other environmental reviews, consultation with the SHPO, identification and consultation with interested parties, and identification of points in the process to seek input from the public and to notify the public of proposed actions.
2. Identification of cultural resources and evaluation of these resources for NRHP eligibility (the process for which is explained below), resulting in the identification of historic properties.
3. Assessment of effects of the project on historic properties.
4. Resolution of adverse effects which includes continued consultation with SHPO/Tribal Historic Preservation Officer and other interested parties and mitigation measures, such as public outreach or data recovery excavation.

An adverse effect on a historic property is found when an activity may alter, directly or indirectly, any of the characteristics of the historic property that render it eligible for inclusion in the NRHP. The alteration of characteristics is considered an adverse effect if it may diminish the integrity of the historic property's location, design, setting, materials, workmanship, feeling, or association. The assessment of effects on historic properties is conducted in accordance with the guidelines set forth in 36 CFR 800.5.

First authorized by the Historic Sites Act of 1935, the NRHP was established by the NHPA as “an authoritative guide to be used by federal, state, and local governments; private groups; and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.” The NRHP recognizes properties that are significant at the national, state, and local levels, based on the following evaluation criteria (NRHP 1997):

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of significant persons in or past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded or may be likely to yield, information important in history or prehistory.

The guidelines further state that “Ordinarily, birthplaces, cemeteries, or graves of historical figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; properties primarily commemorative in nature; and properties that have achieved significance within the past 50 years are not considered eligible for the NRHP”, unless they satisfy certain conditions.

The NRHP requires that a resource not only meet one of these criteria, but that it must also possess integrity. *Integrity* is the ability of a property to convey historical significance. The evaluation of a resource’s integrity must be grounded in an understanding of that resource’s physical characteristics and how those characteristics relate to its significance. The NRHP recognizes seven aspects or qualities that, in various combinations, define the integrity of a property, including: location, design, setting, materials, workmanship, feeling, and association.

## Section 4(f) of the Department of Transportation Act

Section 4(f) of the Department of Transportation Act of 1966 requires that projects funded by or requiring approvals from an agency of the U.S. Department of Transportation are to consider potential impacts on publicly owned park and recreational lands, wildlife and waterfowl refuges, and historic sites in the development and planning of transportation projects. The law, now codified in 49 U.S.C. §303 and 23 U.S.C. §138, is implemented by the Federal Transit Administration (FTA) through regulation 23 CFR 774.

Section 4(f) prohibits FTA from approving a project or program that uses land from publicly owned parks, recreation areas, and wildlife or waterfowl refuges, or any publicly or privately owned historic resource listed in or eligible for listing in the NRHP. These lands and resources are typically referred to as Section 4(f) properties. Use of a Section 4(f) property occurs:

1. When land is permanently incorporated into a transportation facility,
2. When there is a temporary occupancy of land that is adverse in terms of the statute's preservation purpose, or
3. When there is a constructive use (a project's proximity impacts are so severe that the protected activities, features, or attributes of a property are substantially impaired).

The regulation lists various exceptions and limitations applicable to this general definition.

Before approving a project that uses Section 4(f) property, FTA must either determine that the potential impacts are *de minimis* in consultation with the agency having jurisdiction over the 4(f) land, or undertake a Section 4(f) evaluation. If the evaluation identifies a “feasible and prudent” alternative that completely avoids impacts to Section 4(f) properties, it must be selected. If there is no feasible and prudent alternative that avoids all Section 4(f) properties, FTA has some discretion in selecting the alternative that causes the least overall harm. FTA must also find that all possible planning to minimize harm to Section 4(f) properties has occurred.

For publicly owned parks, recreation areas, and wildlife and waterfowl refuges, a *de minimis* impact is one that will not adversely affect the activities, features, or attributes of the property. For historic sites, a *de minimis* impact means that FTA has determined (in accordance with Section 106 of the NHPA) that either no historic property is affected by the project or that the project will have “no adverse effect” on the historic property.

## State

### Washington State Environmental Policy Act

Washington’s State Environmental Policy Act (SEPA) legislation requires that all major actions sponsored, funded, permitted, or approved by state and/or local agencies be planned so that environmental considerations—such as impacts on cultural resources—are considered when state-agency-enabled projects affect properties of historical, archaeological, scientific, or cultural importance (Washington Administrative Code [WAC] 197-11-960). These regulations closely resemble NEPA.



Under SEPA, the Washington State Department of Archaeology and Historic Preservation (DAHP) is the specified agency with the technical expertise to consider the effects of a proposed action on cultural resources and to provide formal recommendations to local governments and other state agencies for appropriate treatments or actions. The degree to which an action may adversely affect districts, sites, buildings, structures, and objects listed or eligible for listing in the NRHP is the primary criterion for determining significant impacts under SEPA. Secondary criteria include whether an alternative has the potential to affect districts, sites, buildings, structures, and objects listed in or eligible for listing in the Washington Heritage Register (WHR), the state equivalent of the NRHP.

The WHR is an official listing of historically significant sites and properties found throughout the state. The list is maintained by DAHP and includes districts, sites, buildings, structures, and objects that have been identified and documented as being significant in local or state history, architecture, archaeology, engineering or culture. To qualify for placement on the WHR, the resource must meet the following criteria.

- A building, site, structure or object must be at least 50 years old. If newer, the resource should have documented exceptional significance.
- The resource should have a high to medium level of integrity (i.e., it should retain important character-defining features from its historic period of construction).
- The resource should have documented historical significance at the local, state, or federal level.

Sites listed on the NRHP are automatically added to the WHR; hence, a separate nomination form does not need to be completed.

## Other State Cultural Resources Laws

Other state laws that govern the protection of historic and archaeological resources include:

- **Revised Code of Washington (RCW) 27.44, Indian Graves and Records.** RCW 27.44 provides protection for Native American graves and burial grounds, encourages voluntary reporting of said sites when they are discovered, and mandates a penalty for disturbance or desecration of such sites.
- **RCW 27.53, Archaeological Sites and Resources.** RCW 27.53 governs the protection and preservation of archaeological sites and resources and establishes DAHP as the administering agency for these regulations.
- **RCW 36.70A.020.** RCW 36.70A.020 includes a goal to “Identify and encourage the preservation of lands, sites, and structures that have historical, cultural, and archaeological significance.” Cities planning under the Washington State Growth Management Act must consider and incorporate this historic preservation goal.
- **RCW 68.60, Abandoned and Historic Cemeteries and Historic Graves.** RCW 68.60 provides for the protection and preservation of abandoned and historic cemeteries and historic graves.

## Local

The City of Lynnwood regulates the impacts of projects on cultural resources within the city (Lynnwood Municipal Code [LMC] Chapter 21.80). It maintains a register of locally recognized cultural resources and regulates changes to these properties. The City of Bellevue has no applicable ordinances regarding cultural resources. In addition, the codes of Snohomish County (Chapter 30.32D) and King County (Title 20.62) provide for the protection and preservation of recognized cultural resources, including designated buildings, sites, objects, and districts.

## Agency and Tribal Consultation

FTA and Sound Transit consulted with the SHPO and potentially affected Native American tribes regarding the proposed project and potential effects on cultural resources. Consultation to date has included:

- Initiation of consultation under Section 106 of the NRHP and invitation to participate in the environmental review process (September 2012).
- Review of the Environmental Impact Statement technical analysis methodologies (January and February 2013).
- Definition of the APE (April 3, 2013). SHPO concurrence on the APE was received on April 25, 2013.
- Eligibility determinations for potentially historic properties identified in the APE (July 24, 2013). SHPO concurred with FTA's determination that no properties within the APE are eligible for listing in the NRHP on August 22, 2013.
- Review of the Draft OMSF Cultural Resources Technical Report prior to publication of the Draft EIS (October 2013).

In addition to the items listed above, FTA and Sound Transit also invited the tribes to provide input on resources that might occur in the project study areas. The potentially affected, federally recognized Native American tribes are the Muckleshoot Indian Tribe, Snoqualmie Tribe, Suquamish Tribe, Tulalip Tribes, and the Yakama Nation. Affected Native American tribes that are not federally recognized are the Duwamish Tribe and the Snohomish Tribe. The Cities of Lynnwood and Bellevue are additional consulting parties.

Copies of relevant agency and tribal correspondence are included in Attachment A.

## Chapter 3

# Environmental and Cultural Setting

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This chapter provides information about the creation of the landforms and the development history that characterize the APE. This information helps with identifying cultural resources in the APE, informs the evaluation of these resources, and is used to frame the research design and methods used for the cultural resources assessment.

## Environmental Setting

### Geologic Background

The APE is located within the Puget Lowland geographic province, a north-south-oriented depression situated between the Olympic mountain range to the west and the Cascade range to the east (Schuster 2009:2). During the Pleistocene epoch (2.588 million to 12,000 years before present [BP]), the Puget Lobe of the Cordilleran ice sheet intermittently advanced southward from British Columbia into the region. Each glacial advance scoured and reshaped the topography created by the previous glacial advance and deposited debris. The current topography of the lowland is primarily the result of surface scouring, subglacial trough erosion, and sedimentary deposition from the most recent glacial advance, known as the Vashon Stade of the Fraser glaciation (Vashon advance) (18,750 to 16,950 BP), followed by fluvial incision of upland glacial plains and infilling of subglacial troughs, as well as coastal shoreline erosion and deposition (Downing 1983; Goldstein 1994; Porter and Swanson 1998; Collins and Montgomery 2011).

All four alternative sites are located within troughs carved out of upland plains comprised of glacial till and outwash deposited during the Vashon Advance. Between the end of the Vashon Advance and the historic era, limited sedimentary deposition—primarily alluvial in origin—has occurred at these alternative sites (WDNR 2013). During the middle- to late-twentieth century, all of the build alternative sites underwent extensive development, which included activities such as land clearing and grading, filling, and construction.

### Flora and Fauna

The APE is located in the Puget Sound region subtype western hemlock vegetation zone. Softwoods, such as Douglas-fir (*Pseudotsuga menzeisei*), western hemlock (*Tsuga heterophylla*), and western red cedar (*Thuja plicata*) are the dominant tree species in the region, while hardwoods such as red alder (*Alnus rubra*) and bigleaf maple (*Acer macrophyllum*) are generally subordinate and found near water courses or in riparian habitats. Garry oak (*Quercus garryana*) groves are found in lower elevations. A wide range of traditionally important resources grow in this vegetation zone, including salal (*Gaultheria shallon*); blueberries and huckleberries (*Vaccinium* sp.); blackberry, salmonberry, and thimbleberry (*Rubus* sp.); and dull Oregon-grape (*Mahonia nervosa*). Geophytes, such as wapato (*Sagittaria latifolia*), common camas (*Camassia quamash*), and tiger lily (*Lilium columbianum*) are also edible (Pojar and MacKinnon 1994; Gunther 1945).

Traditionally important terrestrial and avian faunal resources that are available in the region include mule deer (*Odocoileus hemionus*), elk (*Cervus elaphus*), black bear (*Ursus americanus*), rabbits (*Oryctolagus sp.*), squirrels (*Scirius sp.*), muskrat (*Ondatra sp.*), raccoon (*Procyon lotor*), and ducks and geese (*Anas sp.*) (Ames and Maschner 1999).

## Cultural Setting

### Precontact

Cultural development of the Puget Sound region has been summarized by a number of researchers (Kidd 1964; Greengo and Houston 1970; Nelson 1990; Larson and Lewarch 1995; Matson and Coupland 1995; Ames and Maschner 1999; Blukis Onat et al. 2001). Studies of the archaeology and prehistory of the Puget Sound and surrounding areas divide the prehistoric cultural sequence into multiple phases or periods from about 12,500 to 225 BP. These phases do not necessarily reflect tribal viewpoints.

This document uses the Pacific Northwest coast precontact cultural sequence provided by Ames and Maschner (1999) to help describe patterns in cultural developments in the Puget Sound region. The sequence consists of the following periods.

- **Paleo-Indian (prior to 12,500 BP).** Characterized by sparse populations of highly mobile groups that primarily used terrestrial resources. Assemblages include large stone bifaces and bone technology. Although widespread, artifacts attributed to Paleo-Indian occupation of the Puget Sound region are rare and commonly recorded as isolated finds on upland terraces associated with peat deposits (Williams et al. 2008).
- **Archaic (12,500 to 6,400 BP).** Characterized by use of a wide range of resources. Assemblages include leaf-shaped bifaces, cobble and cobble-flake tools, bone tools, thin shell midden and faunal remains along coastal areas, and an absence of faunal remains in upland areas. Evidence of littoral resource use begins to appear during this period in the larger Pacific Northwest region but not within the Puget Sound region.
- **Early Pacific (6,400 to 3,800 BP).** Characterized by increased evidence of sedentism, expanded use of intertidal resources, and increased dependence on bone and antler tools. Assemblages include bone points, barbs, and harpoons, ground stone points and celts, and extensive shell middens. The earliest evidence of littoral use in the Puget Sound region occurs during this period.
- **Middle Pacific (3,800 to 1800–1500 BP).** Marked by the first evidence of permanent social inequality, as well as a shifting emphasis to storage-based economy, intensification of salmon fishing, increase in the variety of bone and antler tools, and near-modern art styling. Assemblages include artifacts from the Early Pacific period, as well as plank house remains, wooden boxes, toggling harpoons, fish hooks, and fish rakes.
- **Late Pacific (1800–1500 to around 225 BP).** Marked by the emergence of extremely large houses, heavy-duty woodworking tools, and a decreased reliance on chipped stone tools. The archaeological record from this period is comprised primarily of littoral and riverine sites.

Several archaeological sites located throughout the King and Snohomish County uplands and on alluvial terraces adjacent to rivers and streams are thought to be associated with the Archaic and

Early Pacific periods, and consist of surface scatters of heavily weathered basalt flakes, cores, and leaf-shaped points. Based on stylistic comparisons with similar lithic tools associated with organic materials that have been subject to radiocarbon dating at the Glenrose Cannery site in British Columbia, it is postulated that the upland sites in King and Snohomish County are comparable in age and, therefore, were used between 8,000 and 4,000 BP (Nelson 1990).

Although numerous Middle and Late Pacific period archaeological sites are located along the coastal margin of King and Snohomish County, few confirmed archaeological sites from this period are located in the uplands. Until materials that are suitable for radiometric analysis are found in primary depositional context in upland archaeological sites, however, the age distribution of such sites can only be inferred from cross-regional comparisons.

## Ethnography and Ethnohistory

The BNSF Alternative site, BNSF Modified Alternative site, SR 520 Alternative site, and the BNSF Storage Tracks portion of the Lynnwood Alternative are each located within areas traditionally inhabited by the Duwamish people, while the Lynnwood portion of Lynnwood Alternative is located within an area traditionally inhabited by the Sammamish people, both of whom spoke the southern dialects of the Lushootseed language. The Duwamish people traditionally made their home along bays, streams, and lakes in the Seattle vicinity, while the Sammamish traditionally lived along the banks of the Sammamish River (Suttles and Lane 1990:486). Descendants of the Duwamish people are now members of several federally recognized tribes, including the Muckleshoot Indian Tribe, Suquamish Tribe, Snoqualmie Tribe, Tulalip Tribes, as well as the non-federally recognized Duwamish Tribe (CH2M Hill 2009:27). Descendants of the Sammamish tribe are now members of the Tulalip Tribes (Tulalip Tribes 2012).

As with many Puget Sound groups, the Duwamish and Sammamish peoples' settlement patterns varied by season (Smith 1940; Castille 1985; Haeberlin and Gunther 1930). During the winter months, family groups congregated in large winter plank house villages. During the spring and summer, when food resources were readily available but widely spaced across the landscape, family groups dispersed to small summer villages and campsites to harvest important resources. (Suttles and Lane 1990)

Like most southern Coast Salish groups, the Duwamish and Sammamish people used salmon extensively (Haeberlin and Gunther 1930). In addition to salmon, both groups collected a variety of resources from numerous environments. Upland resources like deer, elk, black bear, wild huckleberry, camas, and tiger lily, as well as marine resources like shellfish, herring (*Clupea*), smelt (*Osmeridae*), flatfish (*Pleuronectiformes*), and rockfish (*Sebastidae*), were exploited for food (Gunther 1945; Suttles and Lane 1990: 489). Waterfowl, such as ducks and geese, were exploited for food as well (Suttles and Lane 1990:489).

Initial contact between the indigenous peoples of the Puget Sound region and Europeans began in 1792 with the arrival of Captain George Vancouver. Contact brought many changes to traditional life among the Southern Coast Salish, with the introduction of firearms, European-style clothing, and new food sources (Suttles and Lane 1990:499). By 1820, fur trade routes were established, increasing the number of European Americans in the area, leading the way for settlers and homesteading by the early 1840s.

When the Washington Territory was created in 1853, it included provisions that allowed the United States government to regulate Indian lands, property, and other rights. In 1855, the Treaty of Point

Elliott was signed, establishing the Tulalip Reservation as a permanent home for the Snohomish, Snoqualmie, Skagit, Suiattle, Samish, and Stillaguamish Tribes and allied bands living in the region (Tulalip Tribes 2012). General dissatisfaction and disinterest in moving onto the newly created reservation among many Indians, coupled with European American encroachment onto tribal lands, led to the Indian War of 1855–1856 (Suttles and Lane 1990:500).

## Historical Context

The first European to arrive at the Puget Sound region was Captain George Vancouver, an officer in the British Royal Navy. In command of the ship *Discovery*, Vancouver embarked on an expedition to explore the Pacific region in 1791 with diplomatic, commercial, and geographic features mapped along the way (Bagley 1916:3–6). The fledgling United States soon thereafter secured its claim on lands south of the 49th parallel from Britain, under the Oregon Treaty of 1846 and settlement throughout the Pacific Northwest began in earnest (Hayes 1999:171; Oregon Historical Society n.d.:2). One of the first settlements established in the Puget Sound region was the town of Seattle, officially platted in 1853. Seattle developed into a commercial center with lumber at the core of the community's economy (Bagley 1916:25; Schwantes 1996:125, 238).

By the late 1800s, the vast forests of the Puget Sound region began to draw settlers and entrepreneurs alike. In 1877, the area that became Northup (near present-day Bellevue) was settled by the James Northup family (Eastside Heritage Center 2008:2). This was followed just over a decade later in the Cedar Valley (in the vicinity of present-day Lynnwood) by Duncan Hunter who filed a homestead claim in 1889 (Wilma 2007). During this time, timber continued to be the dominant industry in the area. The densely forested land was soon clear of timber, and berry farms and orchards were developed in the new open spaces (McDonald 1965:142; Wilma 2007). By the 1920s, the fruit and produce grown in these outlying areas filled Seattle markets (City of Bellevue 2010:11). The portions of the APE in both Lynnwood and Bellevue remained relatively rural and isolated into the middle-twentieth century with development limited to sparse residential subdivisions (Lynnwood) and early commercial and industrial development (Bellevue).

## Lynnwood

When the Washington Territory was established in 1853, the area that is now south Snohomish County near the Lynnwood Alternative site had few European American inhabitants. The earliest development in this area was the construction of a "Military Road" by the United States Army in 1857. Intended to help quell hostilities between settlers and Native Americans, the road extended from Fort Steilacoom, southwest of present Tacoma, and Fort Bellingham, near the Canadian border. It is believed to have largely consisted of a narrow trail and ran generally parallel to, and roughly 1 mile east, of the present route of U.S. Highway 99 (Highway 99) (USSG 1860). Underfunded, full construction of a proper road was never completed. However, it helped open the area to settlement that led to substantial population growth beginning in the 1880s (Gilpin and Gillespie 2009:13).

Duncan Hunter, a Scottish immigrant, was the first European American settler in the Lynnwood area. He filed a homestead claim in 1889 for 80 acres of forested land, and he and his family settled on the land in 1891, building a cabin along what is now 36th Avenue W. Other homesteaders soon followed. William Morrice, another Scott, purchased 100 acres just to the east of Hunter's claim, property that would eventually become the Alderwood Mall. Peter Schreiber likewise claimed 160

acres around a small body of water and wetland, which is now known as Scriber Creek and Scriber Lake Park, located along SW 196th Street (Wilma 2007). Portions of both areas are within the APE.

As forests were cleared, landowners like Hunter and Morrice planted orchards. They also worked as stonemasons and were employed in the logging camps and mills of the area. The dense stands of timber (including Douglas-fir, cedar, hemlock, and spruce trees) attracted logging companies to the area, particularly as increased mechanization allowed them to move farther and farther inland, away from Puget Sound. Several lumber mills were established in the Lynnwood area, such as the T. H. Williams Company mill on the south side of Hall's Lake, southwest of the Lynnwood Alternative site. The largest landowner in south Snohomish County was the Puget Mill Company, a subsidiary of Pope & Talbot of San Francisco, which owned over 32,000 acres of land (Robbins and Johnson 1999:4). Between 1900 and 1920, most of what would become Lynnwood was transformed from forest to stump ranch by these companies (Robbins and Johnson 1999; Wilma 2007).

The Lynnwood area remained decidedly rural through the 1940s. Initially, travel north to the area from Seattle involved passage over the Military Road from Edmonds, and over a rough trail that later became the right-of-way for a telegraph line to New Westminster, British Columbia (Gilpin and Gillespie 2009:13). It was not until the establishment of an interurban electric railway line between Seattle and Everett, however, that the Lynnwood area experienced increased levels of development.

Known throughout the region as the Seattle-Everett Interurban, the electric railway line was initially incorporated in 1900 by Fred Sander (Gilpin and Gillespie 2009:14; Robbins and Johnson 1999:4). Sander was responsible for establishing successful cable car and streetcar lines in Seattle, including the Yesler Way cable car line and the Grant Street Electric Railway from Seattle to Georgetown. The first portion of the Seattle-Everett Interurban, renamed the Puget Sound Electric Railway, was completed by 1906. It extended from the community of Ballard, northwest of Seattle, to Hall's Lake located southwest of the Lynnwood Alternative portion of the APE. The railway transported both passengers and lumber, and was powered by installed trolley wire support poles set along the east side of the tracks (Gilpin and Gillespie 2009:14).

The Stone & Webster Engineering Corporation purchased the Puget Sound Electric Railway in 1908 (Robbins and Johnson 1999:4). Later renamed the Pacific Northwest Traction Company and Puget Sound Traction Light & Power, the company extended the interurban railway line through the Lynnwood area in 1909 and commenced operations in 1910 (Gilpin and Gillespie 2009; Robbins and Johnson 1999). From Hall's Lake, the rail line's route ran along the southern boundary of the Lynnwood Alternative site through the APE. The interurban railway's construction included the establishment of 30 stations at several prescribed locations along the railway route through the Lynnwood area and south Snohomish County. Many of these stations were named after natural features in their vicinities, such as Lake Ballinger Station or Halls Lake Station, or to appeal to the sensibilities of potential residents, such as Beverly Park, Alderwood, Intermanor, and Manordale. Small communities, often consisting of both commercial and residential development, were preplanned or naturally emerged around these stations.

Establishment of the Interurban railway provided new and easy access to the large swathes of low-priced stump ranches that characterized the Lynnwood area at the time, significantly influencing its development. Daily runs enabled local residents to commute to Seattle or Everett for work, while freight cars used the same tracks at night to move lumber (Gilpin and Gillespie 2009:15). Land speculators and developers seeking new opportunities systematically purchased land from the logging companies and homesteaders alike, and subdivided it to create new suburban

communities during the Interurban's first years of operation. Agriculture in the area also increased, as farmers benefited from increased access to Seattle markets, including Pike's Place Market, which opened in 1907 (Wilma 2007).

The large timber companies also took part in these speculative enterprises. The Puget Mill Company, for example, subdivided 6,000 acres of its property in the vicinity of the Alderwood Station (situated east of the Lynnwood Alternative site) in 1917. Called Alderwood Manor, the development eventually consisted of 27 platted subdivisions made up of 5-five-to-10-acre "ranchettes." The company sold the ranchettes as small farms for \$200 per acre to individuals seeking a pastoral existence while maintaining proximity to urban Seattle. The "manor" part of the development's name was added to the station moniker by California realtor W.A. Irwin to increase the location's appeal (Robbins and Johnson 1999; Wilma 2007).

Irwin promoted the development as a major source of revenue and convinced the Puget Mill Company to invest \$250,000 in the creation of a 32-acre demonstration farm (Robbins and Johnson 1999; Wilma 2007). The farm taught new residents how to cultivate crops and raise chickens for their eggs, a primary source of income for many of these farms. The model farm also enabled potential buyers to witness first-hand the bucolic semi self-sufficient lifestyle the new development advertised. Through a national advertising campaign and network of sales offices, Alderwood Manor attracted thousands of investors from all over the United States. Between 1917 and 1922, the development's population boomed from 22 to over 1,400 (and included well over 200,000 hens). The new residents became known as "Little Landers" (Wilma 2007).

Alderwood Manor's continued growth was hampered by high land prices and eventually the Great Depression. Contemporary studies found that buyers of land in Alderwood Manor paid as much as 300% more per acre than comparable stump ranch land sold by other companies. The development's touted "self-sufficient" agricultural benefits also left many residents struggling at a subsistence level. The Great Depression further affected residents by causing an approximate 90% fall in egg prices. These conditions forced many residents to leave, while others endeavored to adapt to the new circumstances. For example, some farmers converted their chicken ranches to mink farms, an industry that thrived with some success until the 1940s (Wilma 2007).

The Little Lander's economic diversification helped spur the development of an established community. The demonstration farm, which was eventually forced to shut down because of the poor economy, had a community center open to all and included a school. Around these amenities, the Little Landers opened stores, started churches, and founded community groups such as the Odd Fellows, Masons, and Ladies Aid Society.

The interurban railway remained the locus of commercial development in south Snohomish County through the 1920s and 1930s. The prevalence of automobiles was on the rise, however, and the region experienced exponential growth in road construction during this period. In the 1920s, the State of Washington initiated construction of the state highway system, which included extension of the new Pacific Highway from Seattle through the Lynnwood area to Everett. Highway 99, located about 1 mile west of the older interurban railway route, was dedicated in 1927 and completed in 1932 (Gilpin and Gillespie 2009: 15).

The highway's construction shifted the focus of commercial development in south Snohomish County to the area around the new road corridor. The intersection of Highway 99 and Alderwood Road, known as Evergreen Crossroads or just "the Crossroads" (now 196th Street SW), became the new nexus of the emerging community. Businesses previously established around the Seattle



Heights interurban station (to the south of the APE) continued to thrive and new roadhouses, such as The Willows and The Blakewood Inn, were established along the highway, offering dining, dancing, overnight accommodations, and (according to rumor) bootleg alcohol to travelers. The Interurban railway ceased operation in 1939, further giving rise to the automobile's prominence (Wilma 2007).

In 1937, Seattle realtor Karl O'Beirn platted a tract of land along Highway 99 between SW 196th Street and SW 200th Street, intending to develop it as a residential subdivision. Named after his wife Lynn, the development soon provided the area with a local identity. Within months, a neighboring property owner established a lumber business called Lynnwood Lumber and other capitalists started the Lynnwood Feeder Supply, Lynnwood Variety, Lynnwood Cleaners, and others. The Lynnwood Commercial Club was established by this collection of business owners in 1946 (Wilma 2007).

The population of Lynnwood and surrounding communities boomed in the late 1940s with the end of World War II and the return of veterans and war workers, armed with readily available cash and low-interest loans. A large number of residential subdivisions were established along the Highway 99 corridor during this period to accommodate the influx of families. Housing construction lagged behind other areas, however, due to a lack of a proper infrastructure and municipal services in the unincorporated communities of Alderwood Manor and Lynnwood.

The City of Lynnwood was incorporated in 1959 to help resolve these issues. After several years of discussion and a couple of failed attempts, the move was eventually successful in part because of the construction of I-5 north of Seattle. Apparently, only a municipal government had authority to regulate housing construction, which included the removal of dilapidated structures from private lots to make way for the interstate's construction. The newly incorporated municipality encompassed 3 square miles northeast of Edmonds, north of Montlake Terrace, and east of Alderwood Manor, and had an initial population of approximately 6,000 (Wilma 2007).

Construction of I-5 from 1959 to 1967 accelerated population growth in the Lynnwood area and facilitated construction of new commercial and retail developments in the community's increasingly suburban locale. Located south and east of the Lynnwood Alternative portion of the APE, the new freeway included the introduction of two major interchanges along Lynnwood's eastern boundary, forming what is known as the "Lynnwood triangle." These interchanges caused the focus of Lynnwood's commercial and industrial centers to shift away from Highway 99 and the Crossroads, instead pulling commercial development east along SW 196th Street and south along 44th Avenue SW (Wilma 2007).

With these changes came plans for much larger commercial developments. In 1966, the Alderwood Mall Corporation announced plans to build a large shopping center near the Alderwood Manor, northeast of the Lynnwood Alternative portion of the APE. After a delay of about 10 years, due to poor economic conditions, the Alderwood Mall opened for shoppers in September 1979. During this period, explosive growth transformed Lynnwood from a quiet farming community to a sometimes confused mix of strip malls, shopping centers, parking lots, restaurants, and hotels. Much of Alderwood Manor was annexed to the City of Lynnwood in 1984, and Maple Park (the last section of unincorporated land in the vicinity) was annexed in 1988 (Wilma 2007).

Today, the City of Lynnwood continues to grow as a well-established suburban community. The old Crossroads, where SW 196th Street crossed the old Highway 99, is one of the busiest intersections in

the state and the former demonstration farm and ranchettes have been replaced by development that is more recent.

## Bellevue

Early settlers and entrepreneurs were especially drawn to Lake Washington and its “Eastside,” because of the access its wide-ranging watershed provided to rich coal and timber resources. The first European to explore Lake Washington was Colonel Isaac N. Ebey. In 1850, Ebey ventured up the Duwamish River by canoe and explored the lake for several days, noting the thick forest and vegetation clinging to the shoreline. Ebey named the body of water Geneva but it was also invariably called Dawamish or Duwamish on early government maps. In 1854, Thomas Mercer, an early pioneer of Seattle who later went on to become a county commissioner and judge, suggested the name Lake Washington (Bagley 1916:27,38,46; Rochester 1993).

Coal was first discovered on the eastside of Lake Washington in 1867 near Coal Creek near present-day Newcastle. As a result, William Meydenbauer and Aaron Mercer staked large claims in the area in 1869, becoming some of the first nonnative settlers there. German-born Meydenbauer, who owned a prosperous bakery in Seattle, settled next to what is now Meydenbauer Bay, near downtown Bellevue. Mercer secured the land around what is now known as the Mercer Slough (Rochester 1998).

By the 1870s, much of the land surrounding Lake Washington was acquired by Seattle-based businesses and investors looking to capitalize on its plentiful resources, and many of Lake Washington’s present-day communities were first established at this time. Marshall Blinn, Jacob Furth (a banker), and Bailey Gatzert (the mayor of Seattle) purchased property that would become Hunts Point; Albert King and his brothers homesteaded Groat Point and Eastland in 1875 (Rochester 1998); and Isaac Bechtel, Sr. established a logging operation near what would become downtown Bellevue. Logging camps and timber mills, coal mines, and steamboat landings also led to the founding of the Lake Washington communities such as Kenmore, Juanita, Medina, Kirkland, and Renton.

By the 1880s, timber was the dominant industry around Lake Washington. Settlers cleared the land for farming and mills were established up and down the lake. Isaac Bechtel, a Canadian, was responsible for logging most of Medina, Bellevue, and Mercer Island during this time. Bechtel and his sons cut and gathered so many logs in Meydenbauer Bay that at times it was said, “you could walk across on them” (McDonald 1955a:84). The establishment of the Seattle, Lake Shore, and Eastern Railroad to Redmond in 1886 helped ensure the economic success of the Eastside timber industry (Stein 1998a).

Early attempts to establish railroad connections to the Eastside were generally unsuccessful. The discovery of coal near what is now Issaquah and Renton led entrepreneurs to charter a railroad in 1865, connecting the mines to Seattle. However, the railroad line was never built. The Seattle Coal and Transportation Company eventually built a simple railway system after a subsequent coal discovery near Newcastle. The system involved a series of mules and horse teams to pull coal cars back and forth on wooden tramways to landing docks, where rail cars were put on scows and towed across Lake Washington to Lake Union. This railroad was replaced by a new narrow gage railroad, constructed by the locally sponsored Seattle and Walla Walla Railroad, in 1878. It provided connections to Renton and Newcastle from Seattle around the south end of Lake Washington, but never proceeded farther east or north. In 1886, another locally backed effort, the Seattle, Lakeshore

and Eastern Railroad, constructed a railroad line from the Seattle waterfront around the north sides of Lake Union and Lake Washington, and then along the eastern shores of Lake Sammamish to Issaquah and on to Snoqualmie Pass (Boswell et al. 2011:4-10).

The Northern Pacific Lake Washington Beltline, which runs through the BNSF Storage Tracks, BNSF Alternative and BNSF Modified Alternative portions of the APE, was first conceived in May 1890. At this time, the Northern Pacific Railway Company (Northern Pacific) agreed to partner with a local group and incorporated as the Lake Washington Beltline Company. The company's intent was to promote industrial development around Lake Washington with rail connections and a ship canal to connect with Puget Sound. Northern Pacific also agreed to build a railroad spur to Kirkland for supplying coal and iron to the integrated steel mill and town proposed by Peter Kirk. The railroad purchased the Seattle, Lake Shore, and Eastern Railroad and began plans to finish the beltline along the east side of Lake Washington, but work was halted by the economic panic of 1893. Northern Pacific eventually completed the beltline and put it into operation in 1904. The beltline helped the railroad move freight more quickly north-south through the region by bypassing downtown Seattle's congested rail yards (Boswell et al. 2011:4-11).

Establishment of the railroad along Lake Washington's east side through Bellevue dramatically increased access to the community and encouraged the expansion of industry and permanent settlement in the area. Much of the land along the shoreline was soon clear of timber, and berry farms and orchards were developed in the new open spaces (McDonald 1965:142). After aggressive harvesting of the timber, the land was often left as "stump ranches," which limited their subsequent use. Stump ranches consisted of the stumps and logging debris left over after the timber was cut, and this land was typically subject to lower property taxes than that applied to intact stands of timber. Berry farms, orchards, and poultry farms were generally the preferred use of the land following timber harvesting in these locations, due to the low initial investment required for improvements.

The land encompassing the BNSF Alternative and BNSF Modified Alternative portions of the APE was originally part of a 160 preemption claim purchased by John Sims and his wife Agnes in 1872. The claim included a small lake at its southwest corner, what is now Lake Bellevue. The Sims did not remain on the land, however, and soon sold the parcel to Elizabeth Mackintosh, a resident of Seattle, likely as a speculative venture. Mackintosh subsequently sold the claim to a neighboring landowner, Clark M. Sturtevant, in 1875. Sturtevant combined the land with his own preemption claim and maintained a residence on the property with his wife and family, said to be near the current site of the Bellevue City Hall. He practiced subsistence farming and supplemented his income by trapping small animals for their fur. The entire area was still heavily forested in the 1870s, so Sturtevant, like other early land claimants, likely also logged or sold timber to supplement his income (Boswell et al. 2011:4-7).

By 1890, about 20 families had settled in the Points area of the Eastside from Bellevue to Kirkland, and by June 1900 the federal census counted 254 people in the Bellevue precinct (City of Clyde Hill 2011). Much of the Eastside area was a haven for berry growing and fruit orchards, although logging continued as the mainstay of the economy. Transportation access to the Eastside was provided by long overland trails to the north and south, the railroad, and small boats crossing the lake. It was not until steamboat service began on Lake Washington in the late 1880s, however, that residents had access to regularly scheduled transportation to Seattle from Meydenbauer Bay or Newcastle. Tows helped float rafts of logs across to mills on the west side.

The Eastside's thriving agricultural and logging industries encouraged permanent settlement of the area and supported the establishment of new commercial ventures. Bellevue's first permanent school was built in 1892, and the town of Bellevue was platted in 1904 (City of Bellevue 2010:10; Stein 1998b). Near the APE, G.W. Rittenhouse purchased land from Clark Sturtevant and opened a general store at the railroad flag stop at Lake Sturtevant. L.D. Godsey acquired and expanded the operation circa 1909, and named the surrounding area "Midlakes" because of its central position between Lake Washington and Lake Sammamish. The small commercial center was further expanded in the 1910s with the addition of a blacksmith and barbershop across the road from the Godsey store (Boswell et al. 2011:4-11).

In 1908, Sturtevant platted property around the small lake on his land, which had become known as Lake Sturtevant (now Lake Bellevue), located south of the BNSF Alternative and BNSF Modified portions of the APE. The "Brierwood Park Addition," which was recorded on August 12, 1908, laid out 90 residential lots around the lake with the lake itself set aside as a reserve. Encompassing both the BNSF Alternative and BNSF Modified Alternative portions of the APE, the boundaries of this addition extended from the Northern Pacific Beltline on the west to approximately what is now 124th Avenue NE on the east, and from approximately what is now NE 20th Street on the north and what is now NE 8th Street on the south (Boswell et al. 2011:4-8,4-15). Development of the land began soon thereafter.

Construction of the Northern Pacific railroad is primarily attributed with bringing the first Japanese immigrants to the Eastside. Along with other newly arrived immigrants from throughout Europe and Asia, Japanese immigrants had a large presence in the Pacific Northwest in the early-twentieth century and helped fill labor demands in the railroad, logging, and farming industries of King County. Outside Seattle, Japanese populations were centered in Bellevue—especially on farms in the Midlakes area—and in the White River and Puyallup valleys.

The first Japanese settled in the White River Valley in 1893, but moved into the Bellevue area by the 1900s, as the availability of arable land became increasingly scarce. Japanese truck farmers sold their produce at the Pike Place Market beginning in 1912, 5 years after the market was founded, and occupied 70% of the market stalls by the start of World War I. By the 1920s, Japanese farmers supplied a remarkable 75% of Seattle and King County's vegetables and 50% of its milk supply. Many Japanese got their start as seasonal laborers, later leasing farms or acquiring land of their own.

The Midlakes area eventually became the center of the Japanese farming community in Bellevue. By 1918, at least two families had settled on tracts in the Brierwood Park Addition and more followed in 1931. By 1941, nearly all the parcels in the subdivision, except for those along NE 8th Street, were either owned or leased by Japanese families with small farms producing vegetables and fruit (Boswell et al. 2011:4-12). The Bellevue Pioneer Cemetery—recorded west of the BNSF Alternative and BNSF Modified Alternative portions of the APE along 116th Avenue NE—at one time interred as many as 25 to 30 Japanese who had pioneered the Midlakes area, and is a tangible reminder of their role in Bellevue's development.

Bellevue remained primarily a small farming community through the 1930s and 1940s with some residents commuting by ferry to jobs in Seattle. The ferry service from Madison Park to Kirkland was the most popular route, bringing people and goods to or from Seattle in just over 30 minutes. Many families also used Eastside property for summer vacations (City of Bellevue 2010:11; Stein 2000).

In 1940, the relative isolation of the Eastside ended with the opening of the Lacey V. Murrow Bridge just south of Bellevue. It was the first floating bridge across Lake Washington (the present-day route of the Interstate 90 [I-90] bridges) (Wilma 2001). The bridge's construction spurred tremendous growth in Eastside communities, resulting in rapid housing development and increased property values, in what had once been an almost exclusively agricultural area. U.S. Highway 10 was one of Washington State's original highway routes established in 1926 and served as the state's main east-west highway. Originally, U.S. Highway 10 went around the south end of Lake Washington through Renton and Issaquah on the way from Seattle to Snoqualmie Pass. The route was changed to the general corridor now served by I-90, following the opening of the Lacey V. Murrow Bridge. The old route of U.S. Highway 10 was redesignated at this time, eventually becoming State Route 900 in 1964 (Bozanich 2001).

After the United States entered World War II, the Eastside's Japanese residents were sent to internment camps. This action, along with construction of the Lacey V. Murrow Bridge and I-90 signaled the end of the agricultural era of the Eastside, and the beginning of its suburban development (City of Bellevue 2010).

World War II brought more growth to the Eastside, particularly with the influx of workers at the Boeing and Pacific Car & Foundry (later PACCAR) plants in Renton. In 1946, developer Kemper Freeman opened Bellevue Square shopping center, the first shopping center in the region and one of the first in the country (Stein 1998b). Meanwhile, housing and commercial developments on the Eastside mushroomed. Bellevue and Clyde Hill incorporated in 1953, followed by Medina and Hunts Point in 1955, and Yarrow Point in 1959 (Stein 1998b; City of Clyde Hill 2011; City of Medina 2011).

Safeway, Inc. exemplified this development in its construction of the company's existing regional distribution center at 1121 124th Avenue NE in 1957-1959, encompassing a 47.5-acre parcel on the east side of 120th Avenue NE (Boswell et al. 2011:4-19). The facility was the first light industrial complex in Bellevue and supplanted the last remaining Japanese farms in the Midlakes area. The former farmhouses and outbuildings of the Brierwood Park Addition were largely removed during this period to make way for the construction of warehouses and other commercial and industrial facilities. Meanwhile, new residential developments were initiated to the east of the Bellevue commercial center, including the community of Lake Hills and Overlake Park mixed-use development, in the mid-1950s (Boswell et al. 2011:4-19).

Bellevue and other Eastside communities continued to expand with the completion of the second bridge span across Lake Washington, the Evergreen Point Bridge, and 4 miles north of the Lacey V. Murrow Bridge. It was constructed to carry SR 520 (originally Primary State Highway 1, Evergreen Point branch), which initially extended from I-5 in Seattle to the junction of Lake Washington Boulevard NE and Lincoln Avenue (now Bellevue Way) in Bellevue. Construction of the bridge began in August 1960, and it officially opened in August 1963 (Reynolds 1988:F1). The segment of SR 520 from Interstate 405 (I-405) to 148th Avenue NE opened in the early 1970s, and the segment between West Lake Sammamish Parkway and State Route 202 (SR 202) opened in the mid-1970s with the route number State Route 920 (SR 920) as a "Super-2 freeway." This segment was widened to a divided four-lane freeway by 1990. The final segment of SR 520 between 148th Avenue NE and West Lake Sammamish Parkway opened circa 1979. At this time, SR 920 was redesignated as SR 520 (Bozanich 2012). For Eastside communities, the completion of SR 520 and the Evergreen Point Bridge led to even more residents and greater development pressures.

Automobiles continued to influence development of the Eastside through the 1970s, since many residents moved away from Seattle's center and began commuting by car. This decentralization of the workforce resulted in ever-increasing traffic. In the 1960s, the relative isolation of the Eastside ended with the construction and opening of I-405 (1968), I-5 (1965), and the completion of SR 520 (1979) (Bozanich 2012; Dougherty 2008; NETR 2009). By the 1970s, commercial and industrial development had effectively replaced agriculture at the BNSF, BNSF Modified, and SR 520 Alternative sites.

## Chapter 4

# Literature Review

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In December 2012, ICF conducted a records search using DAHP's online Washington Information System for Architectural and Archaeological Records Database (WISAARD) to identify previously documented cultural resources in and within 0.5 mile of the APE. WISAARD contains all records and reports on file with DAHP, including completed cultural resources survey reports, properties listed in or determined eligible for listing in the NRHP, documentation of WHR-listed properties, archaeological sites, cemeteries, and inventoried built environment resources. The records search was supplemented with ethnographic place name data obtained from Waterman (Hilbert et al. 2001) and Buerge (1984). The results of the records search for each build alternative are presented below.

## Lynnwood Alternative

The literature review results for the Lynnwood Alternative are separated into two sections to reflect its location across two discontinuous geographies. These include the Lynnwood Alternative portion of the APE located in Lynnwood and the proposed use of the Eastside Rail Corridor in Bellevue as the BNSF Storage Tracks.

## Lynnwood Alternative Site

Eight cultural resources surveys have been previously conducted within 0.5 mile of the Lynnwood Alternative site in Lynnwood. One of these surveys was completed in 2012 for the *Lynnwood Link Extension Draft EIS* (Silverman et al. 2012). During this survey, a single archaeological site (45SN609) not eligible for listing in the NRHP was identified just northeast of the Lynnwood Alternative portion of the APE in Lynnwood. The archaeological site consists of several elements of a historic-period structure in-ruin (Silverman et al. 2012). The *Lynnwood Link Extension Draft EIS* (Sound Transit 2013) also recorded 16 non-NRHP eligible historic properties in the Lynnwood Alternative portion of the APE in Lynnwood. No NRHP-eligible properties were recorded by any of the other seven surveys, but several archaeological sites were identified in the vicinity of the alternative site. Table 4-1 lists all cultural resources surveys conducted within 0.5 mile of the Lynnwood Alternative site portion of the APE in Lynnwood.

**Table 4-1. Cultural Resources Surveys Conducted within 0.5 Mile of Lynnwood Alternative Portion of the APE**

<b>NADB #</b>	<b>Report Title</b>	<b>Author/Date</b>	<b>Description</b>	<b>Resources</b>
1342623	<i>Letter to Steve Bingham Regarding Proposed Regional Express Lynnwood Project Cultural Resources Assessment</i>	Robbins and Johnson 1999	Pedestrian survey and shovel probes	None
1351904	<i>Cultural Resources Assessment for the 44th Avenue West Interurban Trail and Trail Bridge Project, Snohomish County, Washington</i>	Dampf and Gilpin 2008	Pedestrian survey, shovel probes, and built environment survey	None
1353293	<i>A Historical Resources Assessment of the Hall Lake East Project, Lynnwood, Snohomish County, Washington</i>	Gillespie 2009	Built environment survey	None
1354531	<i>Cultural Resources Assessment for the Gorman Hotel &amp; Storage/Retail Project, Snohomish County Washington</i>	Dellert and Butler 2012	Archival Research and Pedestrian Survey	No NRHP-eligible resources. 45SN559 (not NRHP-eligible) recorded outside of APE.
1354532	<i>Cultural Resources Assessment for the Hall Lake East Project, Snohomish County, Washington</i>	Silverman and Dellert 2010	Archival Research, Pedestrian Survey, and Shovel Probes	No NRHP-eligible resources. 45SN552, 45SN553, and 45SN564 (not NRHP-eligible) recorded outside of APE.
1353787	<i>Cultural Resources Assessment for the Edmonds Interurban Trail Project, Snohomish County, Washington</i>	Gilpen and Gillespie 2009	Archival Research and Pedestrian Survey	No NRHP-eligible resources. 45SN531 (not NRHP-eligible) recorded in APE.
1682641	<i>Cultural Resources Assessment of the City of Everett Parks – Replacement Property Project, Everett, Snohomish County, WA.</i>	Chambers 2012b	Archival Research and Pedestrian Survey	No NRHP-eligible resources. 45SN531 information updated.
None	<i>Lynnwood Link Extension Technical Report, Cultural, Archaeological, and Historic Resources</i>	Silverman et al. 2012	Archival Research, Pedestrian Survey, and Shovel Probes	No NRHP-eligible resources. 45SN609 (not NRHP-eligible) recorded outside of APE.
NADB = National Archaeological Database.				



WISAARD indicated that one historical archaeological resource (45SN531) was previously recorded in the Lynnwood Alternative portion of the APE in Lynnwood (Gilpen 2009; Chambers 2012a; Silverman 2012). The archaeological site, which is a segment of the Everett Interurban Railway, extends southwest-northeast through the southern portion of the Lynnwood Alternative site APE. It was determined not eligible for listing in the NRHP (Silverman 2012). No other archaeological sites have been recorded in the Lynnwood Alternative portion of the APE in Lynnwood. Including 45SN531, a total of six archaeological sites and isolates were previously documented within 0.5 mile of the Lynnwood Alternative portion of the APE in Lynnwood (Table 4-2). The archaeological sites and isolates all date from the historic era and include features such as building foundations and structural remains, glass fragments, a railroad grade, and a tree stump with springboard notches. All of the archaeological sites and isolates were recommended not eligible for listing in the NRHP (Silverman and Dellert 2010; Gilpen and Gillespie 2009; Gillespie 2009).

No ethnographic place names have been recorded in the vicinity of the Lynnwood Alternative portion of the APE.

**Table 4-2. Archaeological Resources Located within 0.5 Mile of the Lynnwood Alternative Portion of the APE**

<b>Trinomial</b>	<b>Recorder/Date</b>	<b>Contents</b>	<b>NRHP evaluation</b>
45SN531	Gilpin 2009; Chambers 2012a; Silverman 2012	Seattle-Everett Interurban rail grade	Not Eligible
45SN552	Silverman 2010a	Historic structural remains (in ruin) with refuse	Not Eligible
45SN553	Silverman 2010b	Historic structural remains (in ruin)	Not Eligible
45SN559	Gilpen 2010	Trees with springboard notches	Not Eligible
45SN564	Silverman 2010c	Historic window glass isolate	Not Eligible
45SN609	DAHP 2012a; Dellert et al. 2012	Historic structural remains (in ruin) with refuse	Not Eligible

Sixteen previously recorded historic resources are located in the Lynnwood Alternative portion of the APE (Table 4-3). As stated, these resources were identified during the survey conducted for the *Lynnwood Link Extension Draft EIS*. WISAARD records several other historic resources in the vicinity of, but outside of the Lynnwood Alternative portion of the APE in Lynnwood. These resources represent buildings recorded during DAHP's 2011 HPI Upload Project, using county assessor's data. These properties have not yet been surveyed or evaluated for NRHP eligibility.

**Table 4-3. Historic Resources Located in the Lynnwood Alternative Portion of the APE**

APN	Property Name	Address	Build Date	NRHP Evaluation
00608400300203	Stone Way Electric Supply	20121 Cedar Valley Rd	1966	Not Eligible
00401200000100	Griffith Residence	20302 52nd Avenue W	1960	Not Eligible
00401200000200	Walker Residence	20306 52nd Avenue W	1959	Not Eligible
00401200000300	Bartholet Residence	20316 52nd Avenue W	1959	Not Eligible
00401200000400	Long Residence	5207 204th Street SW	1959	Not Eligible
00401200000500	Sharma Residence	5215 204th Street SW	1959	Not Eligible
00462600400800	Wingsness Residence	20430 52nd Avenue W	1942	Not Eligible
00462600900400	Harris Residence	20618 52nd Avenue W	1950	Not Eligible
00619500000900	R & R Star Towing	20610 48th Avenue W	1956	Not Eligible
00462600800400	Cedar Valley Grange Hall	20526 52nd Avenue W	1926	Not Eligible
00462500800000	Sorenson Residence	20706 52nd Avenue W	1951	Not Eligible
00462601200100	N/A	20806 52nd Avenue W	1960	Not Eligible
00462601200400	N/A	20812 52nd Avenue W	1960	Not Eligible
00462601200500	N/A	20818 52nd Avenue W	1960	Not Eligible
00619500001000	Proctor Sales, Inc.	20715 50th Avenue W	1966	Not Eligible
27042100300400, 27042100403700	Interurban Right-of-way/Trail	N/A	1909	Not Eligible

APN = assessor's parcel number; N/A = not applicable.

## BNSF Storage Tracks

The literature search results for the BNSF Storage Tracks portion of the Lynnwood Alternative are the same as those presented below for the BNSF Alternative and BNSF Modified Alternative.

## BNSF Alternative

Eight cultural resources surveys have been previously conducted within 0.5 mile of the BNSF Alternative portion of the APE. Of these, three of the surveys studied portions of the BNSF Alternative site (Table 4-4). Archaeological Investigations Northwest, Inc. completed a historic resources inventory of the Eastside Rail Corridor through the BNSF Alternative for the BNSF King County Abandonment project in August 2007 (Allen 2007); Northwest Archaeological Associates completed a cultural resources survey along 120th Avenue NE for the NE 4th Street/120th Avenue NE Corridor Project in June 2011 (Boswell et al. 2011); and Historical Research Associates, Inc. (HRA) conducted a cultural resources survey for the proposed Link light rail line through and adjacent to the BNSF Alternative site in July 2011 for the Sound Transit East Link project (Historical Research Associates, Inc. and CH2M Hill 2011).

Three resources were identified by one or more of these surveys within the BNSF Alternative portion of the APE:

- Northern Pacific Railway Lake Washington Beltline (Assessor's Parcel Number [APN]: 2825059038)
- Northern Pacific Railway Safeway Spur (APNs: 2825059326 and 1099100104)
- Safeway Distribution Center at 1121 124th Avenue NE (APNs: 0671000000 and 1099100100)

The Allen (2007) survey concluded that the Northern Pacific Railway Lake Washington Beltline, which comprises the railroad right-of-way running north-south through the BNSF Alternative site, is eligible for listing in the NRHP. The Boswell (2011) survey concurred with this finding and also recorded the Northern Pacific Railway Safeway Spur. The Northern Pacific Railway Spur is a former railroad spur that extended from the beltline to the Safeway Distribution Center on the east side of 120th Avenue NE. The SHPO concurred with the findings of both surveys and formally determined the Northern Pacific Railway Lake Washington Beltline eligible for listing in the NRHP in July 2007; and the Northern Pacific Railway Safeway Spur not eligible for listing in the NRHP in July 2011. No archaeological sites were identified within or in the vicinity of the BNSF Alternative site by either survey.

Concurrent to the Boswell (2011) survey, the HRA and CH2M Hill (2011) survey recorded the entire Safeway Distribution Center (but did not identify individual buildings) and evaluated it as not eligible for listing in the NRHP. Only a part of the Safeway Distribution Center is located within the BNSF Alternative portion of the APE. Contained in this area are two buildings that are less than 45 years old—Buildings #900 and #1100. Building #900 is a large warehouse constructed in 1972 and Building #1100 is an ice cream plant with an estimated construction date of 1978. The HRA and CH2M Hill survey also evaluated a segment of the Northern Pacific Railway Lake Washington Beltline as not eligible for listing in the NRHP. The SHPO concurred with the HRA and CH2M Hill survey findings on June 6 and October 18, 2010. The segment evaluated by HRA and CH2M Hill includes the portion of the Beltline in the BNSF Alternative APE.

Five additional cultural resources surveys were conducted within 0.5 mile of the BNSF Alternative portion of the APE. These surveys did not identify any archaeological resources in this area. However, WISAARD records the location of the Midlakes Pioneer Cemetery just west of the BNSF Alternative portion of the APE. The cemetery was in use between 1892 and 1941. Several of the graves were moved to other nearby cemeteries during the middle- to late-twentieth century (DAHP 2012b).

A single ethnographically named place, *Tc!u* (Northup Creek), is located in the vicinity of the BNSF Alternative site (Hilbert et al. 2001).

No additional archaeological site or historic resources were previously recorded in the BNSF Alternative portion of the APE. WISAARD records several other historic resources in the vicinity of, but outside of, the BNSF Alternative portion of the APE. However, these resources represent buildings recorded during DAHP's 2011 HPI Upload Project, using county assessor's data. These properties have not yet been surveyed or evaluated for their NRHP eligibility.

**Table 4-4. Cultural Resources Inventories Conducted within 0.5 Mile of the BNSF Alternative Portion of the APE**

<b>NADB</b>	<b>Report Title</b>	<b>Author/Date</b>	<b>Description</b>	<b>Resources</b>
1346848	<i>Historic, Archaeological, and Cultural Resources Technical Report</i>	WSDOT 2005	Pedestrian and built environment survey	None
1347091	<i>Cultural Resources Assessment, NE 24th Street Improvements, Bellevue, Washington</i>	Goetz 2006	Pedestrian survey and shovel probes	None
1350317	<i>Historic Resource Inventory of the BNSF King County Abandonment Project. Washington</i>	Allen 2007	Literature search and historic resources survey of Eastside Rail Corridor.	Northern Pacific Railway Lake Washington Beltline determined NRHP eligible.
1353703	<i>SR 520, Medina to SR 202: Eastside Transit and HOV Program Cultural Resources Technical Memorandum</i>	Livingston et al. 2009	Pedestrian survey, shovel probes, and built environment survey	No NRHP-eligible resources located within 0.5 mile of the APE.
1353740	<i>Interstate 405 Corridor Survey: Phase III I-405, SR 520 to I-5 Improvement Project</i>	Bundy 2009	Pedestrian survey and shovel probes	None
1353924	<i>Cultural Resources Survey, Lake Washington Congestion Management Program, SR 520/I-90 – Active Traffic Management Project</i>	Gray and Juell 2009	Built environment survey	No NRHP-eligible resources located within 0.5 mile of the APE.
1681153	<i>NE 4th Street/120th Avenue NE Corridor Project Cultural Resources Technical Report</i>	Boswell et al. 2011	Geotechnical bore analysis and built environment survey	Northern Pacific Railway Lake Washington Beltline determined NRHP-eligible. Identified three non-NRHP eligible historic resources within APE. Several NRHP-eligible resources within 0.5 mile of the APE
N/A	<i>Sound Transit East Link</i>	HRA and CH2M	Pedestrian	Northern Pacific

NADB	Report Title	Author/Date	Description	Resources
	<i>Project, Historic and Archaeological Resources Technical Report</i>	Hill 2011	survey, shovel probes, and built environment survey	Railway Lake Washington Beltline segment determined not NRHP eligible. Identified two non-NRHP eligible historic resources within APE
NADB = National Archaeological Database.				

## BNSF Modified Alternative

The cultural resources surveys and resources located in, and in the vicinity, of the BNSF Modified Alternative portion of the APE are the same as those identified for the BNSF Alternative portion of the APE.

## SR 520 Alternative

No archaeological or historic resources have been previously recorded, and no prior cultural resources surveys have been conducted in the SR 520 Alternative portion of the APE. Three cultural resources surveys have been conducted within 0.5 mile of the SR 520 Alternative portion of the APE. These surveys did not result in the identification of cultural resources (Table 4-5). No ethnographic place names have been documented in the vicinity of the SR 520 Alternative site.

**Table 4-5. Cultural Resources Inventories Conducted within 0.5 Mile of the SR 520 Alternative Portion of the APE**

<b>NADB</b>	<b>Report Title</b>	<b>Author/Date</b>	<b>Description</b>	<b>Resources</b>
1347091	<i>Cultural Resources Assessment, NE 24th Street Improvements, Bellevue, Washington</i>	Goetz 2006	Pedestrian survey and shovel probes	None.
1353924	<i>Cultural Resources Survey, Lake Washington Congestion Management Program, SR 520/I-90 – Active Traffic Management Project</i>	Gray and Juell 2009	Built environment survey	No NRHP-eligible resources located within 0.5 mile of the APE.
N/A	<i>Sound Transit East Link Project, Historic and Archaeological Resources Technical Report</i>	HRA and CH2M Hill 2011	Pedestrian survey, shovel probes, and built environment survey	Northern Pacific Railway Lake Washington Beltline determined not NRHP eligible. Identified two non-NRHP eligible historic resources in the APE.
NADB = National Archaeological Database; N/A = not applicable.				

This chapter defines the objectives of the cultural resources assessment and the expectations used to assess the potential for identifying cultural resources in the APE.

## Objectives

The primary objective of the cultural resources assessment is to determine whether historic properties (including archaeological resources, historic resources, and culturally significant properties) eligible for listing in the NRHP are located in the APE. In the absence of previously documented resources, the secondary objective is to assess the potential for encountering undiscovered archaeological deposits and to determine whether specific alternatives of the proposed project have a higher potential to contain undiscovered archaeological deposits relative to other alternatives. The purpose of these objectives is to provide Sound Transit with actionable information that can be used to inform the alternative selection process without conducting full-scale cultural resources investigations at each of the alternative sites prior to identification of the proposed project's preferred alternative.

## Archaeological Expectations

The following expectations about archaeological site potential were based on the geologic and cultural context outlined in Chapter 2, Environmental and Cultural Setting.

- All four build alternative sites are located within troughs carved into glacial uplands formed during the last major glaciation. Because glacial uplands were formed as a result of the advance and retreat of glacial ice into the region—a period when there would have been no opportunity for human occupation of the land surface—the physical remains of human activities are expected to be located at or near the ground surface in areas that have not been modified during the historic or modern period.
  - If development has resulted in the removal of the predevelopment ground surface on glacial upland landforms (e.g., cutting or grading), it is expected that any archaeological deposits previously associated with the predevelopment ground surface are no longer extant.
  - If development has resulted in the placement of fill over the predevelopment ground surface on glacial upland landforms, it is expected that any archaeological deposits would be located at the interface between fill and the underlying native surface.
- The Lynnwood Alternative, the BNSF Alternative, and the BNSF Modified Alternative portions of the APE are all located in areas that have been subject to alluvial sedimentary deposition during the Holocene epoch. Regional archaeological evidence indicates that humans have occupied the Puget Sound region throughout the Holocene epoch. Therefore, it is expected that areas that contain post-glacial alluvial deposits have the potential to contain buried archaeological deposits.

- Analysis of the precontact culture sequence of the Puget Sound region reveals that documented upland archaeological sites, usually associated with the Archaic and Early Pacific periods, are located in King and Snohomish County. These sites are typically located on terraces adjacent to rivers and streams. Thus, it is expected that archaeological potential would increase as distance to water decreases.
- Analysis of the local historic context indicated the APE remained largely undeveloped until the middle- to late-twentieth century. Early development was agricultural in character. Later development, especially in the BNSF Alternative, BNSF Modified Alternative, and SR 520 Alternative portions of the APE, was primarily commercial and industrial with most of the development occurring after 1970. The APE was expected to have some potential for the presence of agriculture-related resources, but any historical archaeological deposits would likely relate to middle- to late-twentieth century industrial and commercial activities. It was also expected that most historic resources would consist of buildings and structures constructed in the middle- to late-twentieth century.

## Methods

This section describes the research and field methods used to identify and evaluate cultural resources in the APE, and to assess archaeological sensitivity for each of the four build alternatives.

## Research Methods

### Precontact/Historic Context

ICF conducted general and property-specific archival research to establish a historic context for the APE/four build alternative sites. Materials examined included the previous cultural resources studies found during the literature review, as well as primary and secondary resources from local repositories, including maps and photographs. Portions of the general historic context were adapted from the cultural resources technical reports prepared for the Sound Transit East Link project (Silverman 2012) and the *Lynnwood Link Extension Draft EIS* (HRA and CH2M Hill 2011).

### Landform History Analysis

ICF conducted a landform history analysis to assess the extent to which the local geology and development history affects the potential for encountering archaeological deposits in the vicinity of each portion of the APE. This was accomplished by analyzing geologic and historical maps, publications, and existing geotechnical bore logs to develop area-specific contexts for each alternative site. The following sources were used to accomplish this analysis:

- U.S. Geological Survey (USGS) Publications Warehouse (<http://pubs.er.usgs.gov/#home:7:30>),
- Puget Sound LiDAR Consortium (<http://pugetsoundlidar.ess.washington.edu/>),
- Washington State Department of Natural Resources (WDNR), Division of Geology and Earth Resources Subsurface Geology Information System (<https://fortress.wa.gov/dnr/geology/?Site=subsurf>),
- United States Department of Agriculture (USDA)/Natural Resources Conservation Service (NRCS) Web Soil Survey (<http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>),



- WDNR, Division of Geology and Earth Resources Publications (<http://www.dnr.wa.gov/ResearchScience/Topics/GeologyPublicationsLibrary/Pages/pubs.aspx>),
- Geological Society of America (<http://www.gsapubs.org/>),
- Science Direct (<http://www.sciencedirect.com/>),
- Historic Aerials by NETROnline (<http://www.historicaerials.com/>),
- Historic Map Works (<http://www.historicmapworks.com/>), and
- Dataquick (<http://www.dataquick.com/>).

## Washington Statewide Archaeological Predictive Model

ICF consulted the Washington Statewide Archaeological Predictive Model (WSAPM), maintained by DAHP, to provide additional information with which to assess the potential for encountering archaeological deposits in the APE. This information provided a separate set of criteria that differed from the research obtained from other primary and secondary sources. The WSAPM correlates several environmental datasets (elevation, slope, aspect, distance to water, geology, soils, and landforms) and cultural datasets (archaeological sites recorded with DAHP, archaeological survey locations, General Land Office [GLO] sites) to generate predictions about where archaeological resources could be located on the landscape. Based on this information, the model generates five management categories (very high, high, moderate, low, and very low potential for archaeological sites) to assess the potential for archaeological deposits and the need for archaeological survey. These categories are used to define three classes of recommendations for archaeological survey, including survey highly advised (very high and high), survey recommended (moderate), and survey contingent upon project parameters (moderately low and low).

## Field Methods

### Archaeological Investigations

No archaeological field investigations were conducted in support of this cultural resources assessment. Instead, ICF used the results of the records search and landform history analysis to define each build alternative's archaeological sensitivity. The information provided by this analysis was sufficient to fulfill the objectives of this assessment and meet DAHP requirements, without having to conduct full-scale cultural resources investigations prior to identification of a preferred alternative(s).

Since none of the build alternatives contain previously documented archaeological resources eligible for listing in the NRHP, ICF used the data obtained during the landform history analysis to assess whether any portion of the APE had the potential to contain intact archaeological deposits. To do this, ICF archaeologists reviewed subsurface archaeological geotechnical and geoarchaeological data previously collected in and around each of the four build alternative sites. The sedimentary and stratigraphic data obtained from these sources was then organized into three inferred geomorphic origins, based on shared chronological origin and inferred archaeological potential:

- **Glacial.** Sediments deposited as a result of the advance and retreat of the Puget Lobe of the Cordilleran ice sheet during the late Pleistocene, or as a result of earlier glacial or non-glacial periods. These sediments predate human occupation of the region and have limited potential to contain archaeological deposits.

- **Post-glacial.** Deposited after glacial ice retreated from Puget Sound, but cannot be clearly associated with historic or modern filling. These sediments were deposited during a period in which humans have occupied the region and, therefore, have the potential to contain archaeological deposits.
- **Fill.** Deposited during historic and modern development activities. Fill has limited potential to contain intact archaeological deposits.

Based on the distribution of these geologic units and alternative-specific development history, the four build alternative sites were assigned one or more levels of archaeological sensitivity defined as the potential for a given location to contain archaeological deposits in primary depositional context. The criteria for defining each level of archaeological sensitivity are defined below:

- **Low.** Areas that have been subject to extensive development, particularly grading and clearing, and that retain no post-glacial deposits
- **Moderate.** Areas that either contain post-glacial deposits or have been subject to limited development.
- **High.** Areas that contain post-glacial deposits and that have been subject to limited development.

Each build alternative's archaeological sensitivity was then compared to its anticipated archaeological potential, as defined in the WSAPM. In cases where significant differences in archaeological sensitivity/potential were present, a brief discussion of the factors that led to the divergence in findings was presented.

## Historic Resources Survey

The historic resources survey involved examining and evaluating all buildings and structures in the APE determined to be 45 years of age or older. Buildings and structures less than 45 years old were not evaluated to determine NRHP eligibility. The target age of 45 years old was selected to include all resources 50 years old at time of survey, plus any that might become 50 years old through the course of the site development or initial use. ICF senior architectural historian, Christopher Hetzel, MA, conducted the survey and evaluated all of the identified properties in the APE to determine their eligibility for listing in the NRHP. ICF conducted a parcel-by-parcel reconnaissance-level field survey of properties in the APE at each build alternative site in December 2012 and January 2013. Construction dates were established using data from the King County and Snohomish County tax assessors and based on visual inspection. Properties built on or before 1967 were identified and information collected about their physical characteristics. The data collected included one or more photographs of each property from the public right-of-way, the architectural style of each resource (if identifiable), the type and materials of significant features, and the existence of alterations and overall physical integrity. Properties identified as 45 years of age or older were evaluated to determine their eligibility for listing in the NRHP and recorded in the Washington State Historic Property Inventory Form Database, per DAHP reporting standards. Printed forms for recorded properties are provided in Appendix A of this report.

This chapter describes the results of the cultural resources assessment of the APE.

The archaeological landform history analysis revealed that the Lynnwood Alternative site, BNSF Alternative site, and BNSF Modified Alternative site all contain areas with moderate archaeological sensitivity. It is impossible to precisely define the boundaries of these areas given the limited coverage of previous subsurface investigations at these alternative sites. In comparison, the SR 520 Alternative site is considered to have low archaeological sensitivity due to the absence of post-glacial deposits and extensive development in its vicinity. These findings roughly corroborate each alternative site's anticipated archaeological potential as defined by the WSAPM, with minor variations likely owing to the low resolution geology and soils data used by the WSAPM.

The historic resources survey identified 135 buildings and structures in the APE; all but 21 were found to be less than 45 years old. Of these 21, 20 were previously evaluated as not eligible for listing in the NRHP and one is newly recommended as not eligible for listing in the NHRP.

The following results are organized and presented by build alternative.

## Lynnwood Alternative

### Archaeological Resources

#### Landform History Analysis

During the Pleistocene epoch, the Lynnwood Alternative portion of the APE (as well as the entire Puget Sound region) was intermittently covered with glacial ice. The repeated advances and retreats of glacial ice deposited deep glacial, glaciofluvial, and glaciolacustrine sediments and scoured the landscape. Analysis of geologic maps and previously compiled geotechnical and archaeological data indicates that glacial deposits are widely distributed across both portions of the Lynnwood Alternative (WDNR 2013). The Lynnwood Alternative site, including the BNSF Storage Tracks, is located near small post-glacial streams (Scriber Creek in Lynnwood and Kelsey and Yarrow Creeks in Bellevue) that inhabit larger troughs in the glacial landscape. At the Lynnwood Alternative portion of the APE, the upper contact of glacial deposits range from being located at the current ground surface to as much as 10 feet below the ground surface (Silverman et al. 2012: Attachments B and C; Environmental Drilling 1998). A previous geoarchaeological analysis of the landform conducted along 120th Avenue NE in Bellevue, upon which the BNSF Storage Tracks part of the Lynnwood Alternative is situated, reveals that the upper contact of glacial deposits range from 1.5 to 10.9 feet below the ground surface (Boswell et al. 2011:4-24). In both cases, subsurface data are sparse and of limited depth, preventing a detailed analysis of how the depth of the upper contact of glacial deposits varies across each location.

After glacial recession, areas in both portions of the Lynnwood Alternative have been subject to alluvial deposition. Geologic map analysis indicates that post-glacial alluvial deposits are located in the vicinity of Scriber Creek (WDNR 2013). This observation is corroborated by previous subsurface archaeological investigations in the vicinity, which identified buried post-glacial alluvial deposits in the northern portion of the alternative site, in the vicinity of Scriber Creek (Silverman et al. 2012:2-8). Geotechnical borehole data collected along Scriber Creek just southwest of the Lynnwood Alternative portion of the APE in Lynnwood also recorded the presence of alluvial deposits. Although geologic map data identify only glacial deposits in the vicinity of the BNSF Storage Tracks part of the Lynnwood Alternative (WDNR 2013), post-glacial alluvial and lacustrine deposits, ranging from 1.6 to 10.3 feet thick, were identified during a geoarchaeological analysis of the landform upon which the BNSF Storage Tracks portion of the APE is situated (Boswell et al. 2011:4-28).

Analysis of current and historical aerial photographs and historic maps of both portions of the Lynnwood Alternative indicates that extensive development has occurred between the middle-twentieth century and the present. During this period, the Lynnwood portion of the Lynnwood Alternative transitioned from being relatively undeveloped—containing only a few small buildings (western margin of the alternative site) and the Everett Interurban Railroad Line (southern margin of the alternative site)—to an area that was cleared and extensively filled. Filling was particularly extensive in the central and eastern portions of Lynnwood Alternative portion of the APE (USGS aerial photograph 1941; NETR 1954; 2006). Subsurface archaeological data corroborate the placement of fill (Silverman et al. 2012:2-8), although the relative paucity of data and lack of sample depth prevents a detailed analysis of how fill depths vary across the alternative site.

Until the middle-twentieth century, development in the vicinity of the BNSF Storage Tracks portion of the Lynnwood Alternative was primarily limited to the rail line that currently passes through the alternative site, Northrup Wilburton Road (later renamed 116th Avenue NE) to the west, and cleared areas used for agriculture (NETR 1936). Starting with construction of the Safeway Distribution Center in the late 1950s (Boswell et al. 2011), the BNSF Storage Tracks area began to undergo extensive development. By 1980, much of the vicinity had been cleared and was inhabited by residential or commercial buildings (NETR 1980). It is unclear from historic aerial imagery whether these areas were graded, filled, or a combination of both. However, previous geoarchaeological analysis of the BNSF Storage Tracks area indicates the widespread presence of post-glacial sediments and a surprising near-absence of fill (Boswell et al. 2011:4-26); indicating that any filling was relatively shallow and limited in extent.

Although the Lynnwood Alternative portion of the APE has been subject to extensive development starting in the middle- to late-twentieth century—which increases the likelihood for disturbance or removal of archaeological deposits—both portions of the alternative site have areas that contain post-glacial alluvial deposits. Post-glacial alluvial deposits have the potential to contain buried archaeological deposits and the presence of alluvial deposits indicates proximity to water, a factor associated with increased likelihood of encountering archaeological deposits. Therefore, areas in the Lynnwood Alternative portion of the APE that contain these deposits are assumed to have moderate archaeological sensitivity. Such areas are likely to be located along the north and northeast margin of the Lynnwood Alternative site and the central and northern portion of the BNSF Storage Tracks, where previous subsurface investigations documented post-glacial alluvial deposits (Boswell et al. 2011; Silverman et al. 2012) (Figure 6-1 and Figure 6-3).



Given the relatively scarce subsurface data at either location; however, the extent of these alluvial deposits are not well defined. In areas where no post-glacial alluvial deposits are located, archaeological sensitivity is low.

## Washington Statewide Archaeological Predictive Model

The WSAPM indicates that both portions of the Lynnwood Alternative site have a moderately low to moderate risk of encountering archaeological deposits, although much of both locations are characterized as having low to moderately low risk. Only the north-central and north-eastern margin of Lynnwood Alternative site in Lynnwood and the southern margin of the BNSF Storage Tracks are characterized as having a moderate risk of encountering archaeological deposits, the former of which corroborates the findings of the landscape history analysis. The divergence in archaeological sensitivity observed between the WSAPM and the landform analysis for the BNSF Storage Tracks portion of the Lynnwood Alternative is likely a function of the limited accuracy of the geology and soil data used in the creation of the WSAPM.

## Historic Resources

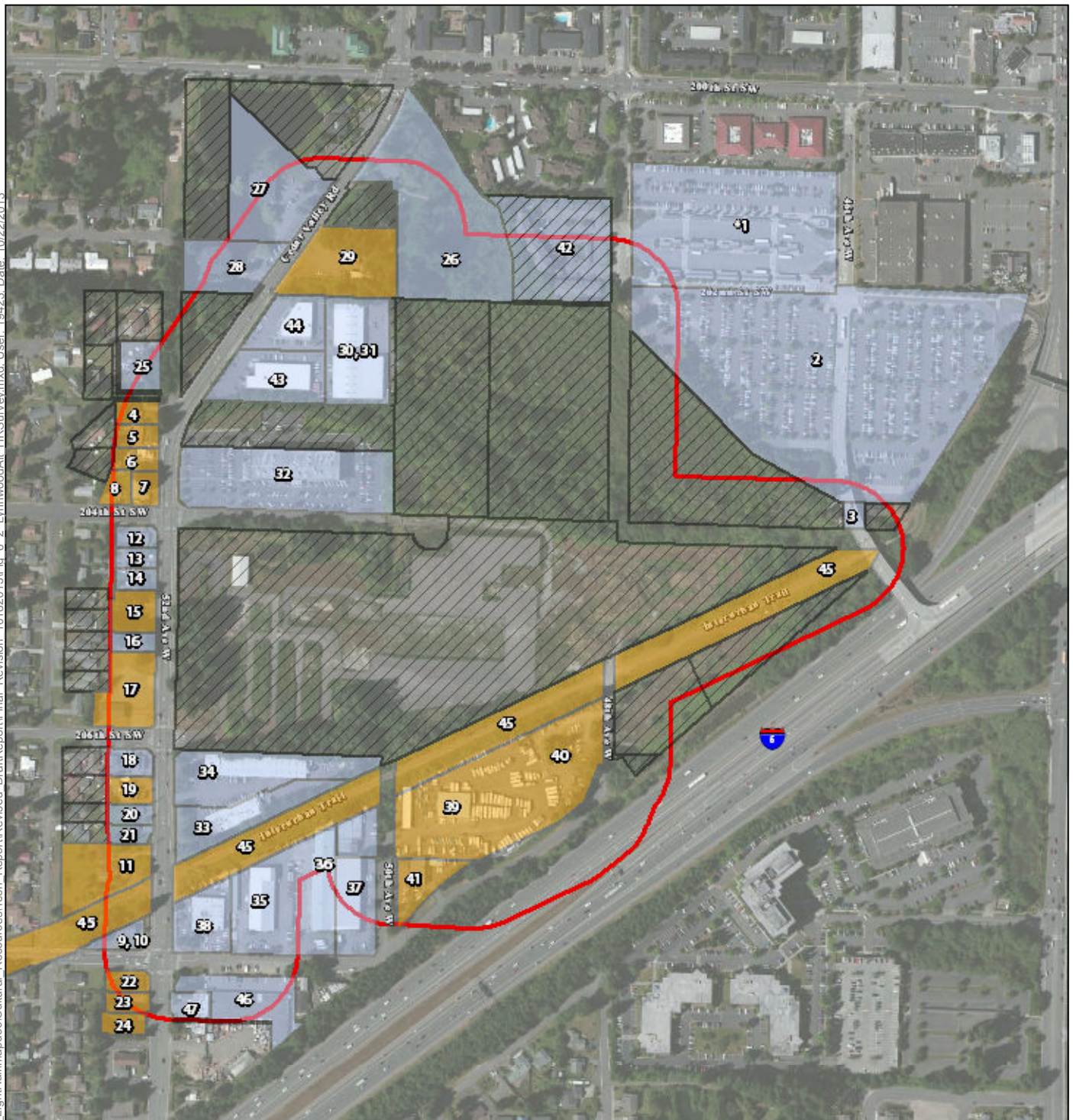
The historic resources survey of the Lynnwood Alternative portion of the APE identified 47 buildings and structures at the alternative site in Lynnwood and 13 buildings at the Bellevue Storage Tracks (Figure 6-2 and Figure 6-4; Table 6-1). Based on Snohomish County tax assessor data and field observations, 16 of the identified resources in Lynnwood are 45 years of age or older. All of these properties were previously evaluated by Silverman (2012) for the Sound Transit *Lynnwood Link Extension Draft EIS* (Sound Transit 2013). All of the other properties in Lynnwood are less than 45 years of age. These properties were not evaluated for NRHP eligibility, due to their age, based on DAHP cultural resources reporting guidelines.



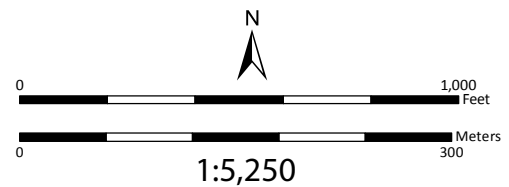
Sources: Site plans, Huitt Zollars, 2013; King County (2012); Puget Sound LiDAR Consortium (2005); USDA/NRCS (2012)

**Figure 6-1:** Lynnwood Alternative—Landform History Analysis  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report





- Area of Potential Effects
- Identified Buildings and Structures
- Not Eligible (Previously Evaluated)
- Less than 45 Years Old
- Vacant Land



\*Map IDs correspond to Table 6-1 in Technical Report

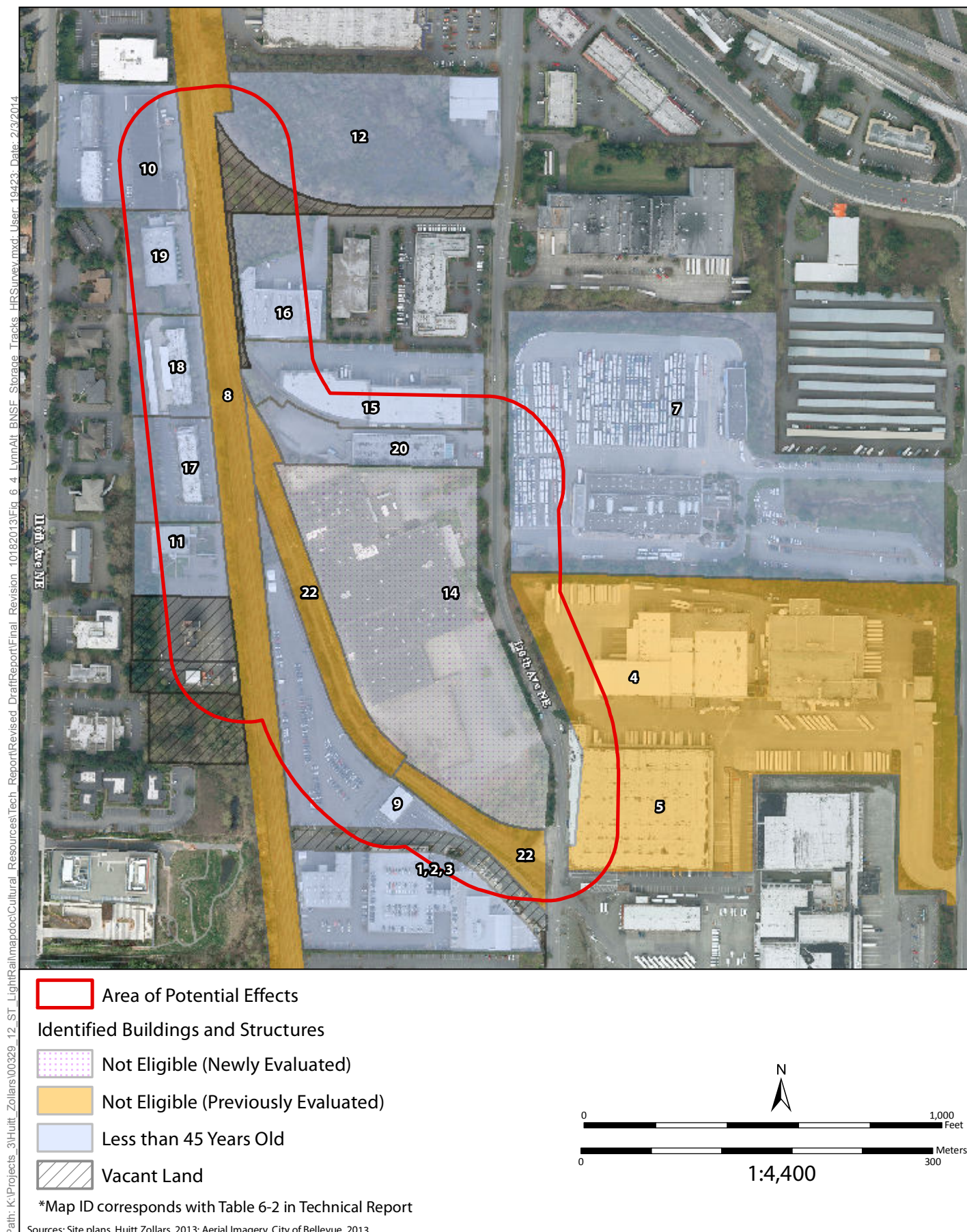
Sources: Site plans, Huitt Zollars, 2013; Snohomish County (2012)

**Figure 6-2: Lynnwood Alternative—Historic Buildings and Structures**  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report



**Figure 6-3: Lynnwood Alternative, BNSF Storage Tracks—Landform History Analysis**  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report





**Figure 6-4:** Lynnwood Alternative, BNSF Storage Tracks—Historic Buildings and Structures  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report

All of the properties at the BNSF Storage Tracks were identified and evaluated as part of the BNSF Alternative and BNSF Modified Alternative and are summarized in Table 6-1.

**Table 6-1. Buildings and Structures Identified in the Lynnwood Alternative Portion of the APE**

Map ID	APN	Property Name	Address	Build Date	NRHP Evaluation
1	00372600600800	Lynnwood Transit Center	20110 46th Avenue W	2004	Less than 45 years old
2	00372600600900	Lynnwood Transit Center Parking Lot	20110 46th Avenue W	2004	Less than 45 years old
3	00372600601101	Lynnwood Pumping Station/Lift Storage Station/Lynnwood P&R Entrance Ramp	N/A	1992	Less than 45 years old
4	00401200000100	Griffith Residence	20302 52nd Avenue W	1960	Not Eligible (previously evaluated)
5	00401200000200	Walker Residence	20306 52nd Avenue W	1959	Not Eligible (previously evaluated)
6	00401200000300	Bartholet Residence	20316 52nd Avenue W	1959	Not Eligible (previously evaluated)
7	00401200000400	Long Residence	5207 204th Street SW	1959	Not Eligible (previously evaluated)
8	00401200000500	Sharma Residence	5215 204th Street SW	1959	Not Eligible (previously evaluated)
9	00462500700000	N/A	5211 208th Street SW	1996	Less than 45 years old
10	00462500700000	Sheldons Custom Cabinets	20626 50th Avenue W	1976	Less than 45 years old
11	00462500800000	Sorenson Residence	20706 52nd Avenue W	1951	Not Eligible (previously evaluated)
12	00462600400100	N/A	20406 52nd Avenue W	1975	Less than 45 years old
13	00462600400400	N/A	20410 52nd Avenue W	1975	Less than 45 years old
14	00462600400500	N/A	20416 52nd Avenue W	1975	Less than 45 years old
15	00462600400800	Wingsness Residence	20430 52nd Avenue W	1942	Not Eligible (previously evaluated)
16	00462600800100	N/A	20504 52nd Avenue W	1977	Less than 45 Years Old

<b>Map ID</b>	<b>APN</b>	<b>Property Name</b>	<b>Address</b>	<b>Build Date</b>	<b>NRHP Evaluation</b>
17	00462600800400	Cedar Valley Grange Hall	20526 52nd Avenue W	1926	Not Eligible (previously evaluated)
18	00462600900100	N/A	5210 206th Street W	2000	Less than 45 years old
19	00462600900400	Harris Residence	20618 52nd Avenue W	1950	Not Eligible (previously evaluated)
20	00462600900800	N/A	20624 52nd Avenue W	1976	Less than 45 years old
21	00462600900900	N/A	20628 52nd Avenue W	1976	Less than 45 years old
22	00462601200100	N/A	20806 52nd Avenue W	1960	Not Eligible (Previously Evaluated)
23	00462601200400	N/A	20812 52nd Avenue W	1960	Not Eligible (previously evaluated)
24	00462601200500	N/A	20818 52nd Avenue W	1960	Not Eligible (previously evaluated)
25	00462700100201	N/A	20220 52nd Avenue W	1977	Less than 45 years old
26	00608400300101	Scribner Lake Park	20015 Cedar Valley Road	1982	Less than 45 years old
27	00608400300105	Cedar Valley Office Park	20016 Cedar Valley Road	1978	Less than 45 years old
28	00608400300202	Cedar Valley Office Park	20102 Cedar Valley Road	1978	Less than 45 years old
29	00608400300203	Stone Way Electric Supply	20121 Cedar Valley Road	1966	Not Eligible (previously evaluated)
30	00608400300300	N/A	20215 Cedar Valley Road	1973	Less than 45 years old
31	00608400300300	L & M Sheet Fabricators, Inc.	20217 Cedar Valley Road	1973	Less than 45 years old
32	00608400300402	N/A	20311 52nd Avenue W	1999	Less than 45 years old
33	00619500000300	Connelly Skis, Inc.	20623 52nd Avenue W	1973	Less than 45 years old
34	00619500000301	Connelly Skis, Inc.	20621 52nd Avenue W	1977	Less than 45 years old
35	00619500000502	N/A	5121 208th Street SW	1986	Less than 45 years old
36	00619500000502	N/A	5015 208th Street SW	1992	Less than 45 years old

Map ID	APN	Property Name	Address	Build Date	NRHP Evaluation
37	00619500000601	Paulson Towing	5001 208th Street SW	1999	Less than 45 years old
38	00619500000602	West Coast Manufacturing	20727 52nd Avenue W	1973	Less than 45 years old
39	00619500000900	R & R Star Towing	20610 48th Avenue W	1956	Not Eligible (previously evaluated)
40	00619500000900	Recreational Storage	20610 48th Avenue W	1973	Less than 45 years old
41	00619500001000	Proctor Sales, Inc.	20715 50th Avenue W	1966	Not Eligible (previously evaluated)
42	00785800100100-00785800302900	Park 5 Condominiums	20104 48th Avenue W	1987	Less than 45 years old
43	01067400000100	N/A	20225 Cedar Valley Road	2007	Less than 45 years old
44	01082800010100, 200, 300, 400	Rice Group, Inc.	20201 Cedar Valley Road	2007	Less than 45 years old
45	27042100300400, 27042100403700	Interurban Right-of-way/Trail	N/A	1909	Not Eligible (previously evaluated)
46	27042100403500	Big E Ales/Pro Home Services/Le Blanc Floors	5030 208th Street SW	1982	Less than 45 years old
47	27042100403600, 27042100404100	JC Auto Restoration/Cascade Trophy Company	20815 52nd Avenue W	1984	Less than 45 years old

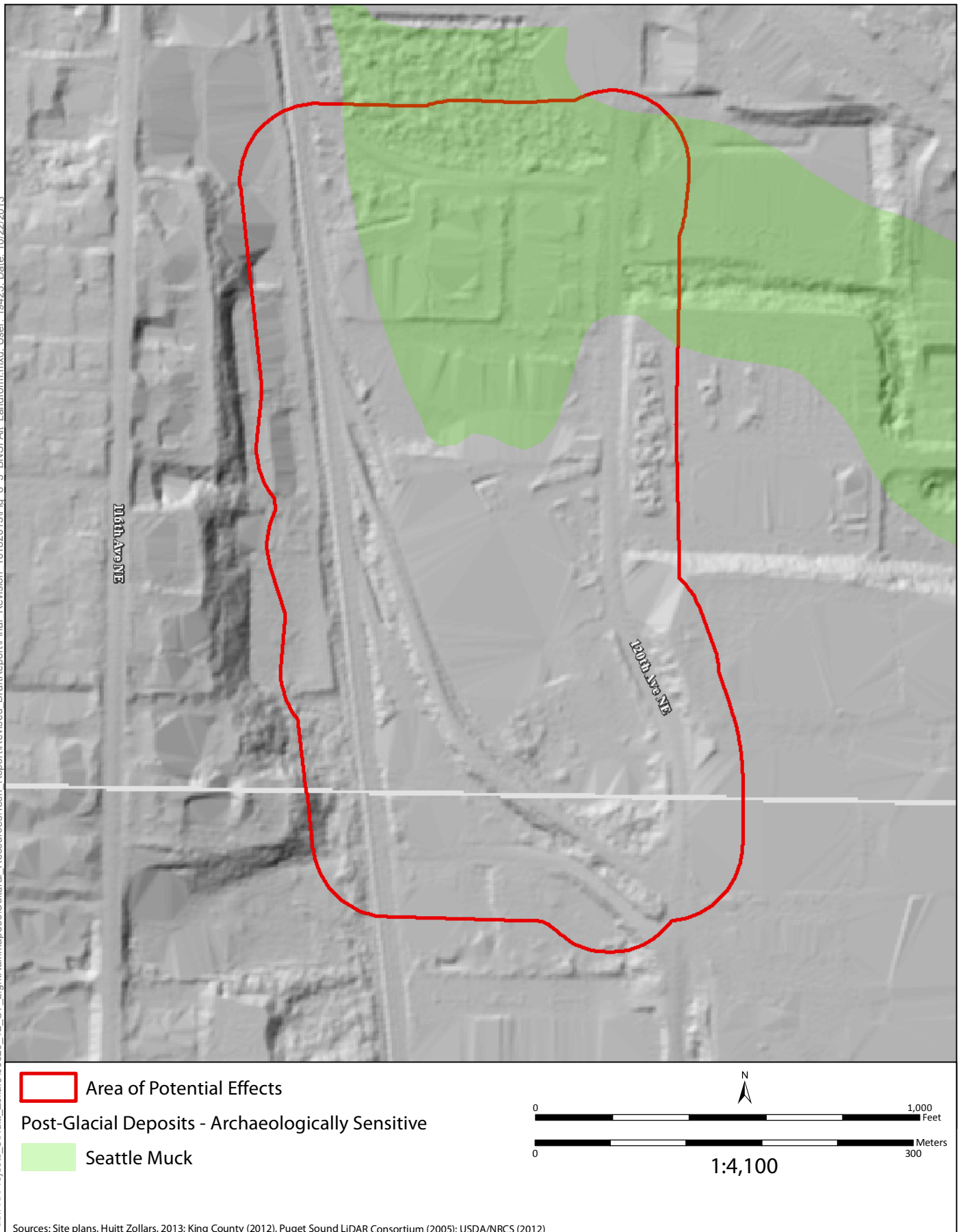
## BNSF Alternative

### Archaeological Resources

#### Landform History Analysis

The landform history of the BNSF Alternative is the same as that for the BNSF Storage Tracks portion of the Lynnwood Alternative. The BNSF Alternative portion of the APE is inferred to have low to moderate archaeological sensitivity. Archaeological sensitivity is anticipated to be highest in areas that contain post-glacial alluvial deposits, which are likely to occur toward the central and northern portion of the BNSF Alternative site based on the results of previous geoarchaeological analyses conducted in the vicinity (Boswell et al. 2011) (Figure 6-5).





**Figure 6-5: BNSF Alternative—Landform History Analysis**  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report

## Washington Statewide Archaeological Predictive Model

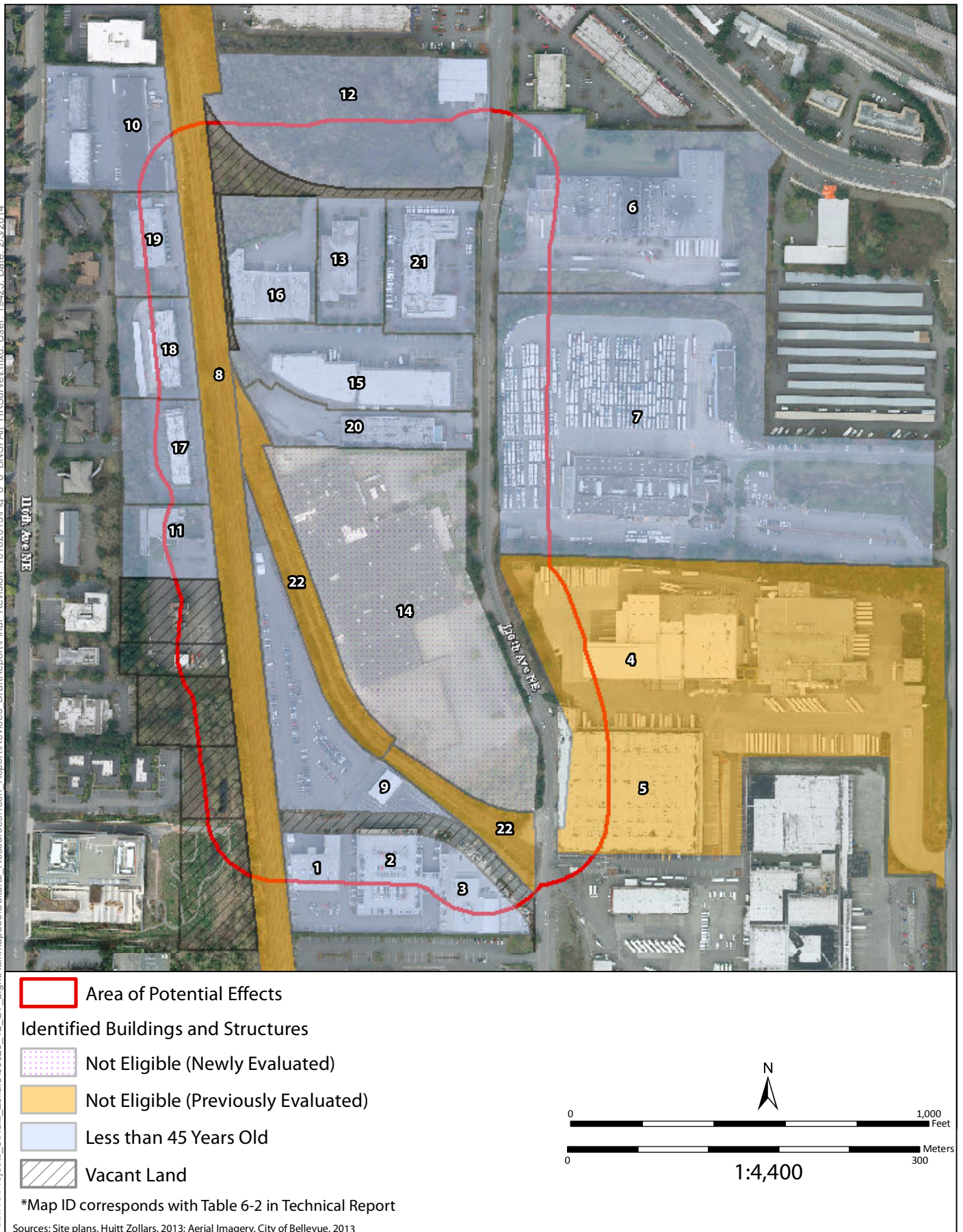
The WSAPM indicates that the BNSF Alternative portion of the APE has a moderately low to moderate risk of encountering archaeological deposits. However, whereas the landform analysis indicates that the central and northern portions of the alternative site have increased archaeological sensitivity, the WSAPM indicates there is increased risk of encountering archaeological deposits in the southern portion. As indicated for the BNSF Storage Tracks portion of the Lynnwood Alternative, it is likely the divergence in archaeological sensitivity observed by WSAPM is a function of the limited accuracy of the geology and soil data used in the creation of the WSAPM.

## Historic Resources

The historic resources survey of the BNSF Alternative identified 22 buildings and structures in this portion of the APE (Figure 6-6; Table 6-2). Based on King County tax assessor data and field observations, only five of these properties were identified as being 45 years of age or older. Of the five, four were previously evaluated by HRA and CH2M Hill (2011) for the Sound Transit East Link project. It was concluded that all of the other properties in this portion of the APE are less than 45 years old. These properties were not evaluated for NRHP eligibility, due to their age, based on DAHP cultural resources reporting guidelines.

The literature review revealed that two of the five properties over 45 years of age were identified and evaluated by previously completed cultural resources surveys. The Allen (2007) survey concluded that the Northern Pacific Railway Lake Washington Beltline (APN 2825059038), which comprises the Eastside Rail Corridor running north-south through the BNSF Alternative site, is eligible for listing in the NRHP. The Boswell (2011) survey concurred with this finding and also recorded the Northern Pacific Railway Safeway Spur (APNs 2825059326 and 1099100104). The Northern Pacific Railway Safeway Spur is a former BNSF railroad spur that extended from the beltline to the former Safeway Distribution Center on the east side of 120th Avenue NE. Boswell recommended the railroad spur as not eligible for listing in the NRHP. The SHPO concurred with the findings of both surveys and formally determined the Northern Pacific Railway Lake Washington Beltline eligible for listing in the NRHP in July 2007, and the Northern Pacific Railway Safeway Spur not eligible for listing in the NRHP in July 2011.

Concurrent with the Boswell (2011) survey, the HRA and CH2M Hill (2011) survey recorded the entire Safeway Distribution Center at 1121 124th Avenue NE (APN 1099100100) and evaluated it as not eligible for listing in the NRHP. The Safeway Distribution Center includes two buildings located in the BNSF Alternative portion of the APE that are less than 45 years old, Buildings #900 and #1100. Building #900 is a large warehouse constructed in 1972 and Building #1100 is an ice cream plant with an estimated construction date of 1978. The HRA and CH2M Hill survey also evaluated the segment of the Northern Pacific Railway Lake Washington Beltline that passes through the BNSF Alternative portion of the APE as not eligible for listing in the NRHP. The SHPO concurred with the HRA and CH2M Hill survey findings on June 6 and October 18, 2010. The SHPO reaffirmed on August 22, 2013, that the segment of the Northern Pacific Railway Lake Washington Beltline that passes through the APE for the current project is not eligible for listing in the NRHP.



**Figure 6-6: BNSF Alternative—Historic Buildings and Structures**  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report



**Table 6-2. Buildings and Structures Identified in the BNSF Portion of the APE**

<b>Map ID</b>	<b>APN</b>	<b>Property Name</b>	<b>Address</b>	<b>Build Date</b>	<b>NRHP Evaluation</b>
1	1099100011	Barrier Audi of Bellevue, Parking Garage (Bldg 1533A)	1533 120th Ave NE	2004	Less than 45 years old
2	1099100011	Barrier Audi of Bellevue, Auto Service Garage and Offices (Bldg 1533B)	1533 120th Ave NE	1975/1985 /2004	Less than 45 years old
3	1099100011	Barrier Audi of Bellevue, Auto Dealership/Showroom	1533 120th Ave NE	2005	Less than 45 years old
4	1099100100	Safeway Building 900	1121 124th Ave NE	1972/1978	Not Eligible (previously evaluated)
5	1099100100	Safeway Building 1100	1121 124th Ave NE	1978	Not Eligible (previously evaluated)
6	2825059007	Safeway Bakery	2100 120th Ave NE	1978	Less than 45 years old
7	2825059026	Metro Transit Operations	1975 124th Ave NE	1977/1982	Less than 45 years old
8	2825059038	Northern Pacific Railway Lake Washington Beltline	11640 NE 8th St	1904	Not Eligible (previously evaluated)
9	2825059070	Barrier Audi of Bellevue, Bay Car Wash (Bldg 1533C)	1533 120th Ave NE	2004	Less than 45 years old
10	2825059087	Lunde Center	2120 116th Ave NE	1980	Less than 45 years old
11	2825059091	Bellevue Public Safety Training Center	1838 116th Ave NE	1984	Less than 45 years old
12	2825059099	Grainger Industries	2221 120th Ave NE	1999	Less than 45 years old
13	2825059156	Choice Medical Supplies	2035 120th Ave NE	1997	Less than 45 years old
14	2825059182	International Paper Building	1899 120th Ave NE	1966–1967	Not Eligible
15	2825059213	Pella Windows & Doors	2019 120th Ave NE	1969	Less than 45 years old
16	2825059218	Pacific Bag	2045 120th Ave NE	1996	Less than 45 years old
17	2825059276	Construction Industry Training Council	1930 116th Ave NE	1989	Less than 45 years old
18	2825059277	Cypress Point Building	1950 116th Ave NE	1989	Less than 45 years old
19	2825059278	Spinner Building	2050 116th Ave NE	2000	Less than 45 years old



Map ID	APN	Property Name	Address	Build Date	NRHP Evaluation
20	2825059294	Eastside Staple & Nail	1917 120th Ave NE	1980	Less than 45 years old
21	2825059307	Molecumetics	2023 120th Ave NE	1991	Less than 45 years old
22	2825059326 1099100104	Northern Pacific Railway Safeway Spur	N/A	1958	Not Eligible (previously evaluated)

The fifth property in the BNSF Alternative portion of the APE identified as being older than 45 years of age is the former International Paper facility at 1899 120th Avenue NE (APN 2825059182). The building was originally constructed in 1967 by Western Paper as a corrugated container plant. It was later operated by Western Kraft, followed by Willamette Industries, until it was acquired by the Weyerhaeuser Company in 2002. International Paper purchased the building in 2008, operating the facility until its permanent closure in 2010 (Wilhelm 2010).

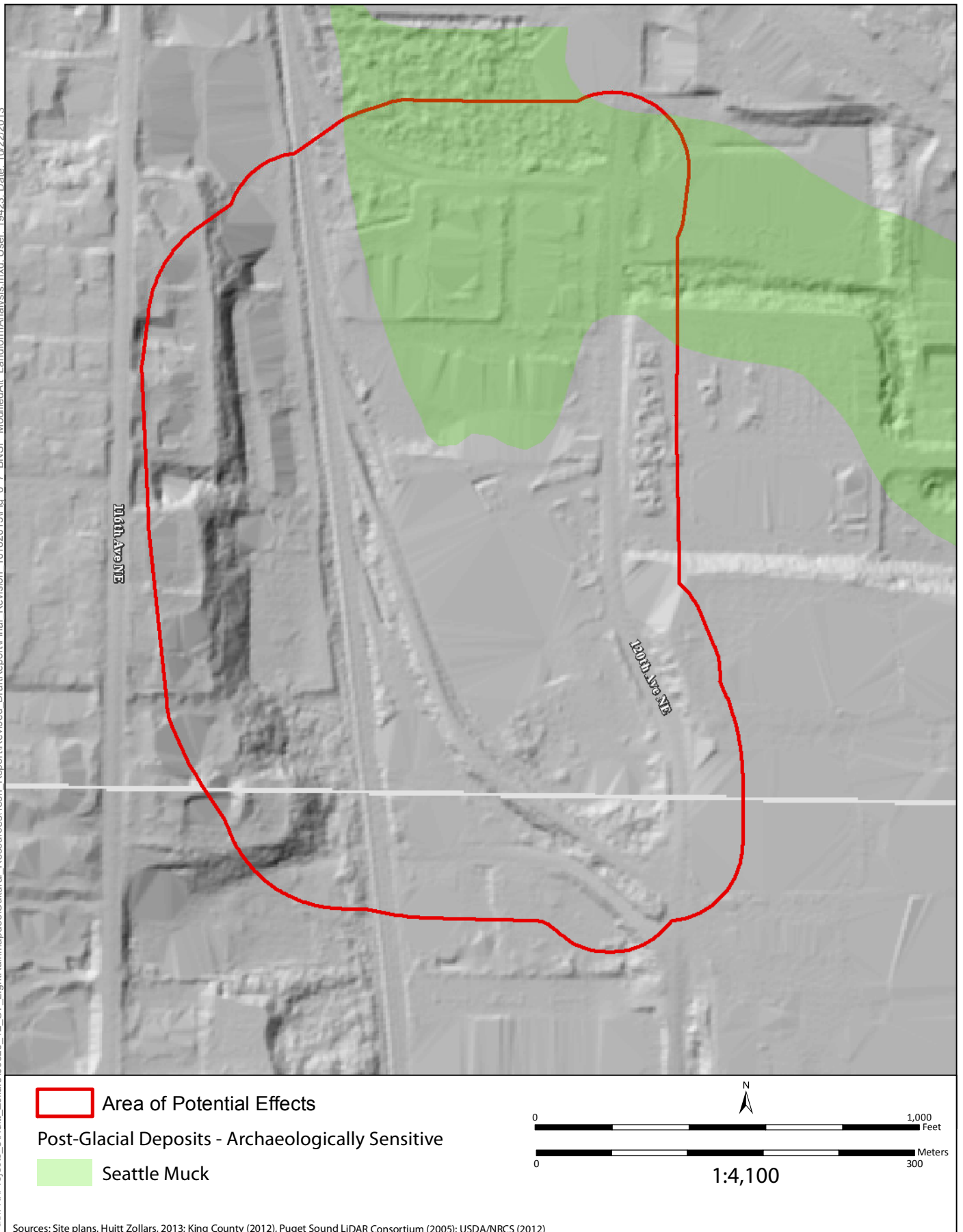
ICF evaluated the former International Paper building to determine its eligibility for listing in the NRHP. Based on NRHP evaluation criteria (36 CFR 60.4), the building is recommended as not eligible for listing in the NRHP. ICF has found no evidence to suggest that the building is associated with events that have made a significant contribution to the broad patterns of history, nor with the lives of persons significant in the community. The building exhibits an industrial utilitarian design with a modernist style façade at the building entrance, but does not appear to embody characteristics or a method of construction that would warrant special recognition. Furthermore, there is no evidence to suggest that it is associated with a significant designer or craftsman. The building is not considered to have the potential to be a principal source of historical information based on its common construction and building type. Based on this review, FTA determined that the building is not eligible for listing in the NRHP. The SHPO concurred with this determination on August 22, 2013.

## BNSF Modified Alternative

### Archaeological Resources

#### Landform History Analysis

The landform history of the BNSF Modified Alternative site is the same as that for the BNSF Storage Tracks portion of the Lynnwood Alternative and the BNSF Alternative. The BNSF Modified Alternative portion of the APE is inferred to have low to moderate archaeological sensitivity. Archaeological sensitivity is anticipated to be highest in areas that contain post-glacial alluvial deposits, which are likely to occur toward the central and northern portion of the alternative site based on the results of previous geoarchaeological analyses conducted in the vicinity (Boswell et al. 2011) (Figure 6-7).



**Figure 6-7: BNSF Modified Alternative—Landform History Analysis**  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report

### Washington Statewide Archaeological Predictive Model

The WSAPM indicates that the BNSF Modified Alternative portion of the APE has a moderately low to moderate risk of encountering archaeological deposits. However, whereas the landform analysis indicates that the central and northern portions of the alternative site have increased archaeological sensitivity, the WSAPM indicates there is increased risk of encountering archaeological deposits in the southern portion. As indicated for the BNSF Alternative portion of the APE, it is likely that the divergence in archaeological sensitivity observed between the WSAPM is a function of the limited accuracy of the geology and soil data used in the creation of the WSAPM.

## Historic Resources

The historic resources survey of the BSNF Modified portion of the APE identified the same properties as those found within the BNSF Alternative portion of the APE, plus 12 additional resources (Table 6-3; Figure 6-8), for a total of 34 resources. Based on King County tax assessor data and field observations, only five of these properties were identified as being 45 years of age or older. They are the same five properties identified in the BSNF Alternative portion of the APE, previously discussed. All of the other properties in this portion of the APE are less than 45 years old. These properties were not evaluated for NRHP eligibility, due to their age, based on DAHP cultural resources reporting guidelines.

**Table 6-3. Buildings and Structures Identified in the BNSF Modified Alternative Portion of the APE**

Map ID	APN	Property Name	Address	Build Date	NRHP Evaluation
1	1099100011	Barrier Audi of Bellevue, Parking Garage (Bldg 1533A)	1533 120th Ave NE	2004	Less than 45 years old
2	1099100011	Barrier Audi of Bellevue, Auto Service Garage and Offices (Bldg 1533B)	1533 120th Ave NE	1975/1985/2004	Less than 45 years old
3	1099100011	Barrier Audi of Bellevue, Auto Dealership/Showroom	1533 120th Ave NE	2005	Less than 45 years old
4	1099100100	Safeway Building 900	1121 124th Ave NE	1972/1978	Not Eligible (previously evaluated)
5	1099100100	Safeway Building 1100	1121 124th Ave NE	1960/1978	Not Eligible (previously evaluated)
6	2825059007	Safeway Bakery	2100 120th Ave NE	1978	Less than 45 years old
23	2825059009	Bellevue Medical Park	1600 116th Ave NE	1979	Less than 45 years old
7	2825059026	Metro Transit Operations	1975 124th Ave NE	1977/1982	Less than 45 years old

Map ID	APN	Property Name	Address	Build Date	NRHP Evaluation
8	2825059038	Northern Pacific Railway Lake Washington Beltline	11640 NE 8th St	1904	Not Eligible (previously evaluated)
9	2825059070	Barrier Audi of Bellevue, Bay Car Wash (Bldg 1533C)	1533 120th Ave NE	2004	Less than 45 years old
10	2825059087	Lunde Center	2120 116th Ave NE	1980	Less than 45 years old
24	2825059090	UW Physicians	1700 116th Ave NE	1987	Less than 45 years old
11	2825059091	Bellevue Public Safety Training Center	1838 116th Ave NE	1984	Less than 45 years old
12	2825059099	Grainger Industries	2221 120th Ave NE	1999	Less than 45 years old
25	2825059102	1800 Professional Building	1800 116th Ave NE	1991	Less than 45 years old
26	2825059106	Overlake Medical Park	1632 116th Ave NE	1984	Less than 45 years old
27	2825059148	Eastside Professional Center	1810 116th Ave NE	1970	Less than 45 years old
13	2825059156	Choice Medical Supplies	2035 120th Ave NE	1997	Less than 45 years old
14	2825059182	International Paper Building	1899 120th Ave NE	1966-1967	Not Eligible
15	2825059213	Pella Windows & Doors	2019 120th Ave NE	1969	Less than 45 years old
16	2825059218	Pacific Bag	2045 120th Avenue NE	1996	Less than 45 years old
17	2825059276	Construction Industry Training Council	1930 116th Avenue NE	1989	Less than 45 years old
18	2825059277	Cypress Point Building	1950 116th Avenue NE	1989	Less than 45 years old
19	2825059278	Spinner Building	2050 116th Avenue NE	2000	Less than 45 years old
28	2825059291	Seattle Children's Bellevue Clinic	1500 116th Avenue NE	2010	Less than 45 years old
20	2825059294	Eastside Staple & Nail	1917 120th Avenue NE	1980	Less than 45 years old
21	2825059307	Molecumetics	2023 120th Avenue NE	1991	Less than 45 years old
22	2825059326, 1099100104	Northern Pacific Railway Safeway Spur	N/A	1958	Not Eligible (previously evaluated)
29	5268300010	McCarthy Park 2100 Building	1200 116th Avenue NE	1979	Less than 45 years old



Map ID	APN	Property Name	Address	Build Date	NRHP Evaluation
30	5268300020	McCarthy Park 2020 Building	2020 116th Avenue NE	1979	Less than 45 years old
31	5268300030	2000 Building	2000 116th Avenue NE	1979	Less than 45 years old
32	5268300040	McCarthy Park 1940 Building	1940 116th Avenue NE	1979	Less than 45 years old
33	5268300050	McCarthy Park 1920 Building	1920 116th Avenue NE	1979	Less than 45 years old
34	6195980000	Northwest Medical	1900 116th Avenue NE	1979	Less than 45 years old

## SR 520 Alternative

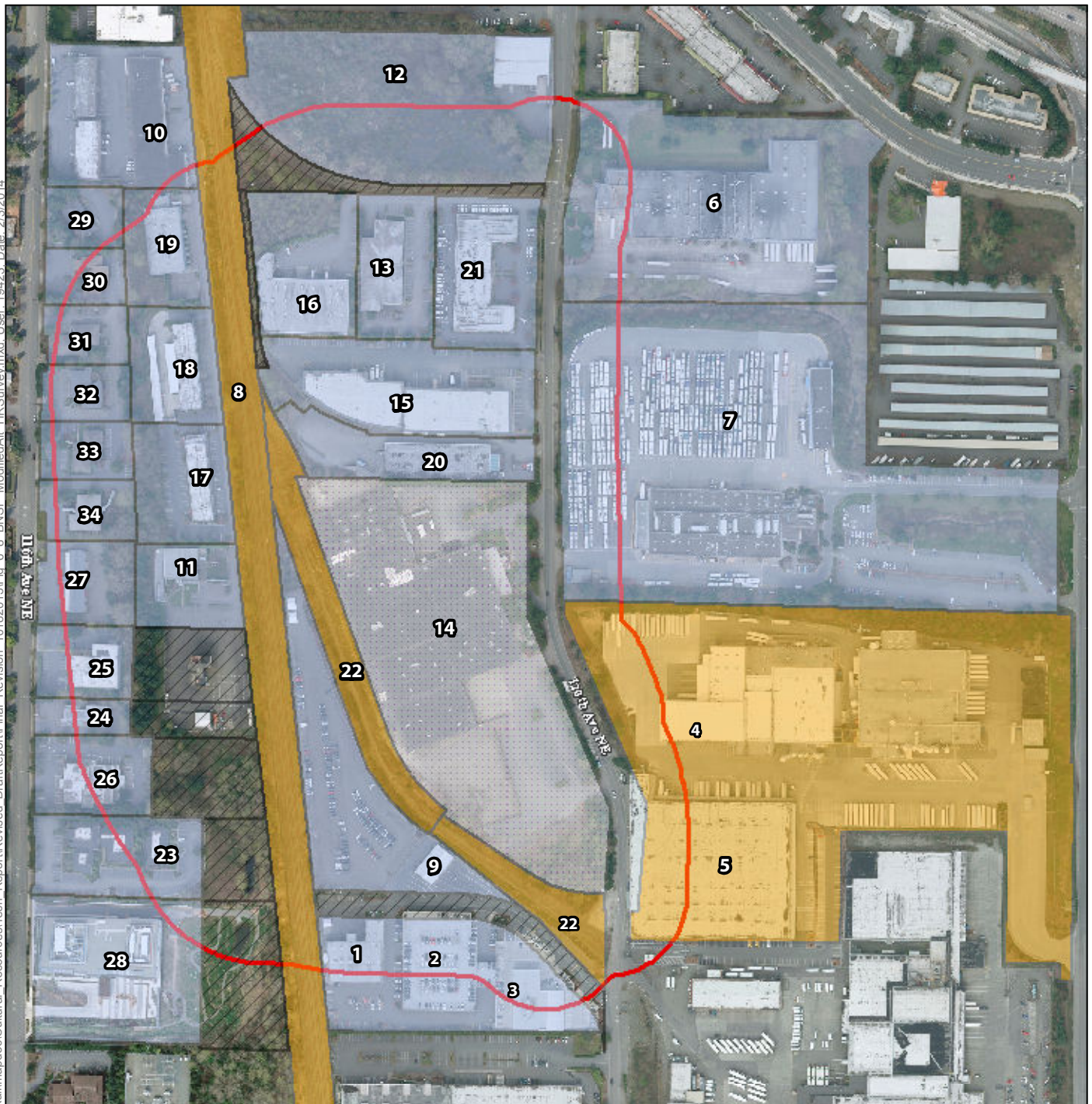
### Archaeological Resources

#### Landform History Analysis

As described for the Lynnwood Alternative portion of the APE, Puget Sound was intermittently covered with glacial ice during the Pleistocene epoch. Analysis of geologic maps and previously compiled geotechnical data indicates that glacial deposits are widely distributed across the SR 520 Alternative portion of the APE (WDNR 2013). The upper contact of glacial deposits in the alternative site range from 0.5 feet to 10 feet below the ground surface (GeoEngineers 2005; TEG Northwest, Inc. 2000).

The SR 520 Alternative portion of the APE is located on a low slope of an upland trough carved out of glacial deposits. As anticipated for this type of setting, none of the geotechnical bores excavated within the SR 520 Alternative site contained post-glacial deposits (GeoEngineers 2005; TEG Northwest, Inc. 2000). Additional review of geotechnical bores that fall just outside of the SR 520 Alternative site reveals no post-glacial deposits (Hart Crowser 2000).

Analysis of current and historical aerial photographs and historic maps of the SR 520 Alternative portion of the APE indicates the alternative site has been extensively developed during the late-twentieth century. In 1936, portions of the alternative site had been subject to limited development, consisting primarily of logging and construction of a few residences. The SR 520 Alternative portion of the APE remained largely undeveloped until the 1970s, when SR 520 was extended across the northern margin of the APE from I-405 in Bellevue to SR 202 in Redmond (NETR 1968, 1969, 1976). Shortly after completion of SR 520, the entire ground surface in SR 520 Alternative site was developed and covered with buildings and pavement (NETR 1980). It is unclear from historic aerial imagery whether these areas were graded, filled, or a combination of both. Previous geotechnical investigations in SR 520 Alternative site reveal that between 2.5 and 4 feet of fill overlay glacial deposits across much of the alternative site (GeoEngineers 2005; TEG Northwest, Inc. 2000).



- Area of Potential Effects**
- Identified Buildings and Structures**
- Not Eligible (Newly Evaluated)
  - Not Eligible (Previously Evaluated)
  - Less than 45 Years Old
  - Vacant Land

\*Map ID corresponds with Table 6-3 in Technical Report

Sources: Site plans, Huit Zollars, 2013; Aerial Imagery, City of Bellevue, 2013

**Figure 6-8:** BNSF Modified Alternative—Historic Buildings and Structures  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report

Given the absence of post-glacial deposits, which have the potential to contain buried archaeological deposits, and the extensive and widespread development that has occurred within the alternative site, it is inferred that SR 520 Alternative portion of the APE has low archaeological sensitivity (Figure 6-9).

## Washington Statewide Archaeological Predictive Model

The WSAPM indicates that the SR 520 Alternative portion of the APE has a moderately low to moderate risk of encountering archaeological deposits. This represents a minor divergence in archaeological sensitivity from the landform history analysis presented for this alternative.

## Historic Resources

The historic resources survey of SR 520 Alternative site identified 54 buildings in this portion of the APE (Table 6-4; Figure 6-10). Based on King County tax assessor data and field observations, all 54 of these properties are less than 45 years of age. These properties were not evaluated for NRHP eligibility, due to their age, based on DAHP cultural resources reporting guidelines. No buildings or structures older than 45 years were identified in this portion of the APE.

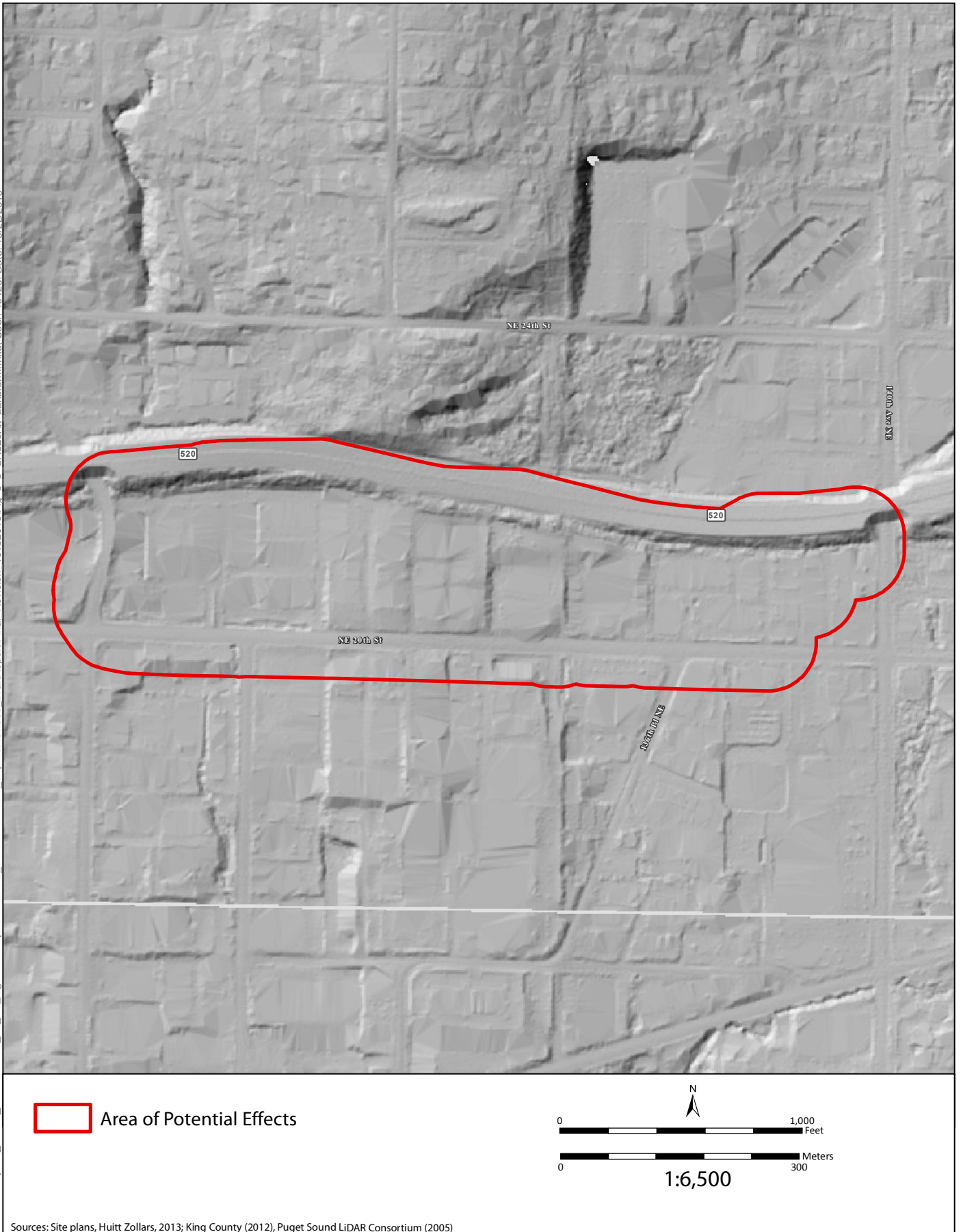
**Table 6-4. Buildings and Structures Identified in the SR 520 Alternative Portion of the APE**

Map ID	APN	Property Name	Address	Build Date	NRHP Evaluation
1	2725059006	US Bank	13830 NE 20th Street	1988	Less than 45 years old
2	2725059007	Northup East Office Park	13240 NE 20th Street	1969	Less than 45 years old
3	2725059051	Dent Wizards/Car Audio Systems/MVP Tires	13201-13205 NE 20th Street	1974	Less than 45 years old
4	2725059051	Bell East Business Park	1900-1910 132nd Avenue NE	1973	Less than 45 years old
5	2725059053	Chevron/Extra Mile	13948 NE 20th Street	1984	Less than 45 years old
6	2725059061	Apple Tree Plaza	13620 NE 20th Street	1977	Less than 45 years old
7	2725059063	Bentley Lamborghini Rolls Royce Bellevue	1880-1882 136th Place NE	1979	Less than 45 years old
8	2725059066	Olson's Tack Shop	2105 140th Avenue NE	1974	Less than 45 years old
9	2725059079	Ski Mart (Northup Park)	13219 NE 20th Street	1974	Less than 45 years old
10	2725059083	Fitness Outlet/Sun Gem Building	13407 NE 20th Street	1973	Less than 45 years old
11	2725059108	Auto Connections	13285 NE 20th Street	1986	Less than 45 years old
12	2725059110	Aston Martin of Bellevue/Park Place Astin Martin/Mercedes	13626 NE 20th Street	1973	Less than 45 years old

Map ID	APN	Property Name	Address	Build Date	NRHP Evaluation
		Garage			
13	2725059122	Northup East Office Park	13240 NE 20th Street	1969	Less than 45 years old
14	2725059148	Park Place Center: Park Place Ltd.	13710 NE 20th Street	1980	Less than 45 years old
15	2725059148	Park Place Center: Park Place Service Center	13730 NE 20th Street	1980	Less than 45 years old
16	2725059148	Park Place Center: Car Toys	13804 NE 20th Street	1980	Less than 45 years old
17	2725059181	Evans Plaza	2205-2255 140th Avenue NE	1969	Less than 45 years old
18	2725059187	Northup East Office Park	13256 NE 20th Street	1970	Less than 45 years old
19	2725059188	Northup East Office Park	13240 NE 20th Street	1971	Less than 45 years old
20	2725059191	Acura of Bellevue	13424 NE 20th Street	1975	Less than 45 years old
21	2725059199	Northup East Office Park	13400 NE 20th Street	1977	Less than 45 years old
22	2725059222	Strictly BMW Independent Service	2111-2115 140th Avenue NE	1974	Less than 45 years old
23	2725059225	NAPA Auto Parts	2033 140th Avenue NE	1975	Less than 45 years old
24	2725059226	Northup East Office Park	13256 NE 20th Street	1974	Less than 45 years old
25	2725059227	Northup East Office Park	13400 NE 20th Street	1976	Less than 45 years old
26	2725059228	Bellevue BMW Auto Showroom and Dealership	13605 NE 20th Street	1988	Less than 45 years old
27	2725059259	Northup East Office Park	13400 NE 20th Street	1977	Less than 45 years old
28	2725059270	Dick's Restaurant Supply	2102 140th Avenue NE	1979	Less than 45 years old
29	2725059288	Park Place Auto Salon	13824 NE 20th Street	1980	Less than 45 years old
30	2725059316	Bellevue Auto Service Center	13421 NE 20th Street	1988	Less than 45 years old
31	2725059319	Land Rover/Jaguar Auto Showroom	13817 NE 20th Street	2005	Less than 45 years old
32	2725059328	Apple Tree Plaza	13622 NE 20th Street	1977	Less than 45 years old
33	2725059329	Apple Tree Plaza	13600 NE 20th Street	1980	Less than 45 years old
34	2725059330	13606 Building	13606 NE 20th Street	1980	Less than 45 years old

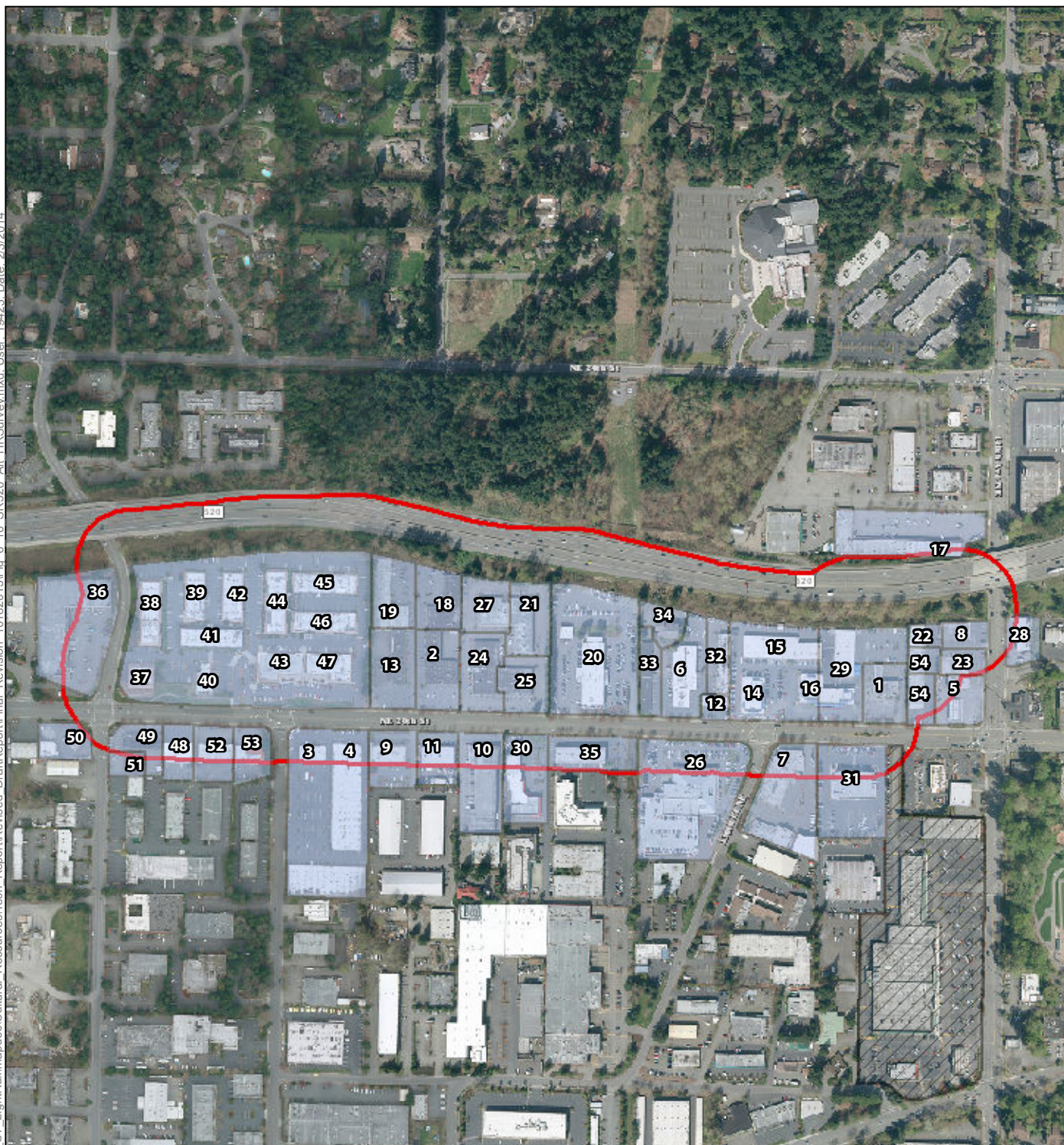


Map ID	APN	Property Name	Address	Build Date	NRHP Evaluation
35	2725059334	Belle Venture Business Park	13423 NE 20th Street	1978	Less than 45 years old
36	2825059001	Northup Distribution Center	12950 Northup Way	1979	Less than 45 years old
37	2825059116	Plaza 520	13000 NE 20th Street	1979	Less than 45 years old
38	2825059116	Plaza 520	13010 NE 20th Street	1979	Less than 45 years old
39	2825059116	Plaza 520	13020 NE 20th Street	1979	Less than 45 years old
40	2825059116	Plaza 520	13102 NE 20th Street	1979	Less than 45 years old
41	2825059116	Plaza 520	13112 NE 20th Street	1979	Less than 45 years old
42	2825059116	Plaza 520	13122 NE 20th Street	1979	Less than 45 years old
43	2825059116	Plaza 520	1320 NE 20th Street	1979	Less than 45 years old
44	2825059116	Plaza 520	13208 NE 20th Street	1979	Less than 45 years old
45	2825059116	Plaza 520	13218 NE 20th Street	1979	Less than 45 years old
46	2825059116	Plaza 520	13228 NE 20th Street	1979	Less than 45 years old
47	2825059116	Plaza 520	13238 NE 20th Street	1979	Less than 45 years old
48	2825059216	Suzuki	13029 NE 20th Street	1974	Less than 45 years old
49	2825059217	Pande Cameron	13013 NE 20th Street	1975	Less than 45 years old
50	2825059229	Arco AMPM	12885 NE 20th Street	1993	Less than 45 years old
51	2825059233	Pande Cameron	1960 130th Avenue NE	1974	Less than 45 years old
52	2825059246	Binder Building	13107 NE 20th Street	1979	Less than 45 years old
53	2825059248	Ecohaus	13131 NE 20th Street	1985	Less than 45 years old
54	2725059224, 2725059223	Fitness Shop/Northwest Auto Center	13900-13910 NE 20th Street	1975	Less than 45 years old

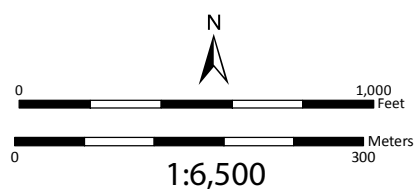


**Figure 6-9: SR 520 Alternative—Landform History Analysis**  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report





- Area of Potential Effects
- Identified Buildings and Structures
- Less than 45 Years Old
- Vacant Land



\*Map ID corresponds with Table 6-4 in Technical Report

Sources: Site plans, Huit Zollars, 2013; Aerial Imagery, City of Bellevue, 2013

**Figure 6-10: SR 520 Alternative—Historic Buildings and Structures**  
Sound Transit Link Light Rail OMSF Draft Cultural Resources Technical Report





## Chapter 7

# Impacts Analysis

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This chapter analyzes the proposed project's potential impacts on identified cultural resources at each build alternative site, based on the results presented in Chapter 6, Results. The proposed project would be considered to have an adverse effect or impact under applicable state and federal regulations, if it were to alter, directly or indirectly, any characteristic of a cultural resource (architectural, historical, or archaeological) that qualifies for inclusion in the NRHP or WHR. All qualifying characteristics of cultural resources are considered, including those that might have been identified subsequent to the original evaluation of the property's eligibility for listing in the NRHP or the WHR. Adverse effects might also include reasonably foreseeable effects caused by the proposed project that could occur later in time, be farther removed in distance, or be cumulative.

Possible adverse effects on cultural resources include, but are not limited to, the following:

- Physical destruction of or damage to all or part of the property.
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines.
- Removal of the property from its historical location.
- Changing the character of the property's use or of physical features within the property's setting that contribute to its historical significance.
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historical features.
- Neglect of a property, which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization.
- Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historical significance.

All four build alternatives and the No Build Alternative were analyzed for their potential to have direct, indirect, and cumulative impacts on significant cultural resources identified in the APE. According to the regulatory requirements of Section 106 of the National Historic Preservation Act (NHPA), as outlined in 36 CFR 800, those effects considered to be adverse would need to be mitigated.

## Impacts Common to All Build Alternatives

All four build alternatives would involve the construction of a new light rail operations and maintenance facility with similar design characteristics, but at a different location. Rail access to the OMSF would be achieved by rail connections between internal rail yards and adjacent light rail lines,

and each build alternative would involve varying levels of grading and ground disturbance to construct this connection and the OMSF's required rail yards, buildings, and structures. The OMSF design at each alternative site would vary based on the constraints presented by the site's proximity to the adjacent light rail lines and the available acreage.

No historic properties eligible for listing in the NRHP are known to exist in any part of the APE. Therefore, future development at any of the four build alternative sites would not be expected to affect any significant cultural resources.

An archaeological landform history analysis was conducted for each portion of the APE. However, the APE has been subject to limited or no subsurface archaeological investigations. Because of this circumstance, it remains possible that previously unknown archaeological resources might be discovered in the APE. The landform history analysis concluded that the Lynnwood Alternative, BNSF Alternative, and the BNSF Modified Alternative portions of the APE each have moderate archaeological sensitivity because they retain areas with post-glacial sediments, despite extensive development. Likewise, the SR 520 Alternative portion of the APE is considered to have low archaeological sensitivity because of the absence of post-glacial sediments. Based on this information, the potential for affecting undiscovered archaeological resources is comparable for the Lynnwood Alternative, BNSF Alternative, and the BNSF Modified Alternative. The possibility for affecting undiscovered archaeological resources by the SR 520 Alternative site is relatively lower, when compared to the other build alternative sites.

Table 7-1 presents a summary comparison of the build alternatives, based on the results of the cultural resources investigations of the APE.

**Table 7-1. Results Comparison between Build Alternatives**

<b>Alternative</b>	<b>Landform Analysis</b>	<b>WSAPM</b>	<b>Documented Archaeological Resources</b>	<b>NRHP-Eligible Historic Properties</b>
Lynnwood Alternative	Moderate Archaeological Sensitivity	Low to Moderate Risk	45SN531	None
BNSF Alternative	Moderate Archaeological Sensitivity	Moderately Low to Moderate Risk	None	None
BNSF Modified Alternative	Moderate Archaeological Sensitivity	Moderately Low to Moderate Risk	None	None
SR 520 Alternative	Low Archaeological Sensitivity	Moderately Low to Moderate Risk	None	None

## No Build Alternative

Under the No Build alternative, construction of the OMSF would not occur at any location. The use of each build alternative site would remain unchanged from current conditions. Therefore, no direct or indirect impacts on any significant cultural resources would be expected as a result of the No Build Alternative.

## **Lynnwood Alternative**

No significant cultural resources were identified in the Lynnwood Alternative portion of the APE. Therefore, no direct or indirect impacts on any significant cultural resources would be expected as a result of the Lynnwood Alternative. The potential to affect as-yet undiscovered cultural resources would be the same as under the BNSF Alternative and the BNSF Modified Alternative, and relatively higher than the SR 520 Alternative.

## **BNSF Alternative**

No significant cultural resources were identified in the BNSF Alternative portion of the APE. Therefore, no direct or indirect impacts on any significant cultural resources would be expected as a result of the BNSF Alternative. The potential to affect as-yet undiscovered cultural resources would be the same as under the Lynnwood Alternative and the BNSF Modified Alternative, and relatively higher than the SR 520 Alternative.

## **BNSF Modified Alternative**

No significant cultural resources were identified in the BNSF Modified Alternative portion of the APE. Therefore, no direct or indirect impacts on any significant cultural resources would be expected as a result of the BNSF Modified Alternative. The potential to affect as-yet undiscovered cultural resources would be the same as under the Lynnwood Alternative and the BNSF Alternative, and relatively higher than the SR 520 Alternative.

## **SR 520 Alternative**

No significant cultural resources were identified in the SR 520 Alternative portion of the APE. No direct or indirect impacts on any significant cultural resources would be expected as a result of SR 520 Alternative. The potential to affect as-yet undiscovered cultural resources would be relatively lower than the Lynnwood Alternative, BNSF Alternative, and BNSF Modified Alternative.

## **Cumulative Impacts**

No significant cultural resources were identified in the APE and none of the four build alternatives is expected to have direct or indirect impacts on historic properties. Because of this circumstance, the proposed project is expected to have no cumulative effects as a result of any of the four alternatives.





## Chapter 8

# Conclusions and Recommendations

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## Conclusions

The cultural resources investigations conducted for the proposed project identified 135 cultural resources in the APE; all but 21 were found to be less than 45 years old. Of these 21, 20 were identified by previously completed cultural resources surveys and determined not eligible for listing in the NRHP. The one remaining resource was identified as the former International Paper facility at 1899 120th Avenue NE (APN 2825059182). ICF concluded that this property does not appear eligible for listing in the NRHP. Based on results of the survey, FTA determined that no historic resources eligible for listing in the NRHP are located in the APE. The SHPO concurred with this determination on August 22, 2013.

## Recommendations

Based on the archaeological investigations conducted for this proposed project, ICF recommends archaeological monitoring or a review of borings logs of project-related geotechnical boreholes to characterize the extent of archaeologically sensitive deposits once a preferred alternative is identified. The results of this monitoring effort should then be used to determine the need for any additional preconstruction subsurface archaeological investigations for the proposed project.



## Chapter 9

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**Attachment A**  
**Agency and Tribal Correspondence**

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# **Initiation of Section 106 Consultation and Scoping Notice September 19, 2012**

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- DAHP
- Muckleshoot
- Snoqualmie
- Suquamish
- Tulalip
- Yakama







U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION X  
Alaska, Idaho, Oregon,  
Washington

915 Second Avenue  
Federal Bldg. Suite 3142  
Seattle, WA 98174-1002  
206-220-7954  
206-220-7959 (fax)

September 19, 2012

Dr. Allyson Brooks, SHPO  
Washington Department of Archaeology and Historic Preservation  
PO Box 48343  
Olympia, WA 98504-8343

**Subject: Sound Transit Link Operations & Maintenance Satellite Facility Project:  
Invitation to Participate in the Environmental Review Process and Scoping Notice**

Dear Dr. Brooks:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Link light rail Operations & Maintenance Satellite Facility (OMSF), pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency for SEPA compliance.

#### **Notification of Undertaking**

The project seeks to identify and evaluate alternative sites for a new OMSF. The alternative sites are located in the cities of Bellevue and Lynnwood in King and Snohomish counties, Washington. A fleet of approximately 180 vehicles is needed to implement the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. The existing Link light rail operations and maintenance facility (OMF) in Seattle is currently configured to serve up to 104 vehicles. The project is needed because the existing OMF site cannot store, maintain, or deploy the expanded fleet of vehicles. The light rail vehicle acquisition and delivery schedule requires additional capacity to be operational by the end of 2020.

An Environmental Scoping Information Report provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at [www.soundtransit.org/OMSF](http://www.soundtransit.org/OMSF).

#### **Initiation of Section 106 Consultation**

To ensure that we account for any effects of this undertaking on properties listed in or eligible for listing on the National Register of Historic Places, FTA confirms the initiation of the Section 106 consultation pursuant to 36 CFR 800.2(a)(4).

### **Invitation to Participate in the Environmental Review Process**

Section 6002 of the federal Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), establishes an enhanced environmental review process for certain FTA projects, such as the OMSF Project. As part of the environmental review process for this project, the lead agencies must identify, as early as practicable, any other Federal and non-Federal agencies that may have an interest in the project, and invite such agencies to become participating agencies in the environmental review process<sup>1</sup>. Your agency has been identified preliminarily as one that may have an interest in this project; accordingly, you are being extended this invitation to become actively involved as a participating agency in the environmental review process for the project.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially with regard to the development of the purpose and need statement, range of alternatives, EIS analysis methodologies, and the level of detail for the analysis of alternatives.
- Identify, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts.
- Provide meaningful and timely input on unresolved issues
- Participate in the EIS scoping process.

Washington Dept of Archaeology and Historic Preservation does not have to accept this invitation. However, if Washington Dept of Archaeology and Historic Preservation, as a federal agency, elects not to become a participating agency, FTA and Sound Transit request that you decline this invitation in writing, indicating that your agency has no jurisdiction or authority with respect to the project, no expertise or information relevant to the project, and does not intend to submit comments on the project. In order to give Federal agencies adequate opportunity to weigh the relevance of their participation in this environmental review process, written responses to this invitation are not due until the close of the scoping process on October 22, 2012. **Please use the enclosed Participating Agency Designation form to accept or decline this invitation by October 22, 2012.**

### **Scoping Meeting**

FTA and Sound Transit invite you to attend the scoping meeting for tribes and agencies on October 9, 2012 at Sound Transit's Ruth Fischer Boardroom, Union Station, 401 S. Jackson Street, Seattle, Washington, 98104 from 1:00 to 3:00 p.m. The scoping comment period begins on September 21, 2012 and ends October 22, 2012. Scoping comments are requested on the project's preliminary Purpose and Need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be included in the EIS.

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<sup>1</sup> Designation as a "participating agency" does not imply that the participating agency supports the proposed project or has any jurisdiction over, or special expertise concerning the proposed project or its potential impacts. A "participating agency" differs from a "cooperating agency," which is defined in regulations implementing the National Environmental Policy Act as "any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment." 40 C.F.R. § 1508.5.

September 19, 2012  
Page 3

If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, please call Dan Drais at (206) 220-4465.

Sincerely,



R.F. Krochalis  
Regional Administrator

cc (by email): Matthew Sterner

Enclosure: Participating Agency Designation Form







U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION X  
Alaska, Idaho, Oregon,  
Washington

915 Second Avenue  
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Seattle, WA 98174-1002  
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206-220-7959 (fax)

September 19, 2012

The Hon. Harry Smiskin, Tribal Chair  
Confederated Tribes and Bands of the Yakama Indian Nation  
Spiel-yi Loop, PO Box 151  
Toppenish, WA 98948

**Subject: Sound Transit Link Operations & Maintenance Satellite Facility Project:  
Initiation of Section 106 Consultation, Invitation to Participate in the Environmental  
Review Process, and Scoping Notice**

Dear Chair Smiskin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Link light rail Operations & Maintenance Satellite Facility (OMSF), pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency for SEPA compliance.

The project seeks to identify and evaluate alternative sites for a new OMSF. The alternative sites are located in the cities of Bellevue and Lynnwood in King and Snohomish counties, Washington. A fleet of approximately 180 vehicles is needed to implement the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. The existing Link light rail operations and maintenance facility (OMF) in Seattle is currently configured to serve up to 104 vehicles. The project is needed because the existing OMF site cannot store, maintain, or deploy the expanded fleet of vehicles. The light rail vehicle acquisition and delivery schedule requires additional capacity to be operational by the end of 2020.

An Environmental Scoping Information Report provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at [www.soundtransit.org/OMSF](http://www.soundtransit.org/OMSF)

#### **Initiation of Section 106 Consultation**

We are initiating this consultation under Section 106 of the National Historic Preservation Act of 1966 and its associated regulations to help us identify places that may have traditional religious and cultural importance to your tribal organization. Please note that we are requesting information only on such

places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We are also interested in potentially affected places of historical significance to your tribe.

### **Invitation to Participate in Environmental Review Process**

In addition, Section 6002 of the federal Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), establishes an enhanced environmental review process for certain FTA projects, such as the OMSF Project. The Confederated Tribes and Bands of the Yakama Indian Nation may have a potential interest due to the possibility of cultural resources and fisheries in the project area; accordingly, FTA invites the tribe to become a participating agency.

As a participating agency, you will be asked to:

- Participate in the project's environment review process (starting in the scoping process), by reviewing and commenting on the purpose and need statement, range of alternatives, probable significant impacts, potential impacts and mitigation measures;
- Identify, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts; and
- Provide meaningful and timely input on unresolved issues, as needed.

Designation as a "participating agency" does not imply that the tribe supports the proposed project or has any jurisdiction over or special expertise concerning it. In order to appropriately involve your tribe in consultation efforts related to this project, we request a written response to this invitation. **Please complete the enclosed Participating Agency Designation form to accept or decline this invitation by October 22, 2012.**


### **Scoping Meeting**

FTA and Sound Transit invite you to attend the scoping meeting for tribes and agencies on October 9, 2012 at Sound Transit's Ruth Fischer Boardroom, Union Station, 401 S. Jackson Street, Seattle, Washington, 98104, from 1:00 to 3:00 p.m. The scoping comment period begins on September 21, 2012 and ends October 22, 2012. Scoping comments are requested on the project's preliminary Purpose and Need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be included in the EIS.

If you have questions regarding this invitation, please contact Dan Drais, FTA Region 10 Environmental Protection Specialist, at (206) 220-4465 or [Daniel.Drais@dot.gov](mailto:Daniel.Drais@dot.gov).

Sincerely,



 R.F. Krochalis  
Regional Administrator

Enclosure: Participating Agency Designation Form

cc (by email): Johnson Meninick, Confederated Tribes and Bands of the Yakama Indian Nation  
Allyson Brooks, SHPO  
Kent Hale, Sound Transit



U.S. Department  
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**Federal Transit  
Administration**

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September 19, 2012

The Hon. Melvin R. Sheldon, Jr.  
Chairman, Board of Directors  
Tulalip Tribes of the Tulalip Reservation  
6700 Totem Beach Road  
Tulalip, WA 98271

**Subject: Sound Transit Link Operations & Maintenance Satellite Facility Project:**  
Initiation of Section 106 Consultation, Invitation to Participate in the Environmental Review  
Process, and Scoping Notice

Dear Chairman Sheldon:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Link light rail Operations & Maintenance Satellite Facility (OMSF), pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency for SEPA compliance.

The project seeks to identify and evaluate alternative sites for a new OMSF. The alternative sites are located in the cities of Bellevue and Lynnwood in King and Snohomish counties, Washington. A fleet of approximately 180 vehicles is needed to implement the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. The existing Link light rail operations and maintenance facility (OMF) in Seattle is currently configured to serve up to 104 vehicles. The project is needed because the existing OMF site cannot store, maintain, or deploy the expanded fleet of vehicles. The light rail vehicle acquisition and delivery schedule requires additional capacity to be operational by the end of 2020.

An Environmental Scoping Information Report provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at [www.soundtransit.org/OMSF](http://www.soundtransit.org/OMSF)

#### **Initiation of Section 106 Consultation**

We are initiating this consultation under Section 106 of the National Historic Preservation Act of 1966 and its associated regulations to help us identify places that may have traditional religious and cultural importance to your tribal organization. Please note that we are requesting information only on such



places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We are also interested in potentially affected places of historical significance to your tribe.

### **Invitation to Participate in Environmental Review Process**

In addition, Section 6002 of the federal Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), establishes an enhanced environmental review process for certain FTA projects, such as the OMSF Project. The Tulalip Tribes may have a potential interest due to the possibility of cultural resources and fisheries in the project area; accordingly, FTA invites the tribe to become a participating agency.

As a participating agency, you will be asked to:

- Participate in the project's environment review process (starting in the scoping process), by reviewing and commenting on the purpose and need statement, range of alternatives, probable significant impacts, potential impacts and mitigation measures;
- Identify, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts; and
- Provide meaningful and timely input on unresolved issues, as needed.

Designation as a "participating agency" does not imply that the tribe supports the proposed project or has any jurisdiction over or special expertise concerning it. In order to appropriately involve your tribe in consultation efforts related to this project, we request a written response to this invitation. **Please complete the enclosed Participating Agency Designation form to accept or decline this invitation by October 22, 2012.**

### **Scoping Meeting**

FTA and Sound Transit invite you to attend the scoping meeting for tribes and agencies on October 9, 2012 at Sound Transit's Ruth Fischer Boardroom, Union Station, 401 S. Jackson Street, Seattle, Washington, 98104, from 1:00 to 3:00 p.m. The scoping comment period begins on September 21, 2012 and ends October 22, 2012. Scoping comments are requested on the project's preliminary Purpose and Need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be included in the EIS.

If you have questions regarding this invitation, please contact Dan Drais, FTA Region 10 Environmental Protection Specialist, at (206) 220-4465 or [Daniel.Drais@dot.gov](mailto:Daniel.Drais@dot.gov).

Sincerely,



*R.F.*  
R.F. Krochalis  
Regional Administrator

Enclosure: Participating Agency Designation Form

cc (by email): Richard Young, Tulalip Tribes, THPO  
Allyson Brooks, SHPO  
Kent Hale, Sound Transit



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

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September 19, 2012

The Hon. Leonard Forsman, Chair  
Suquamish Tribe  
PO Box 498  
Suquamish, WA 98392

**Subject: Sound Transit Link Operations & Maintenance Satellite Facility Project:**  
Initiation of Section 106 Consultation, Invitation to Participate in the Environmental Review  
Process, and Scoping Notice

Dear Chairman Forsman:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Link light rail Operations & Maintenance Satellite Facility (OMSF), pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency for SEPA compliance.

The project seeks to identify and evaluate alternative sites for a new OMSF. The alternative sites are located in the cities of Bellevue and Lynnwood in King and Snohomish counties, Washington. A fleet of approximately 180 vehicles is needed to implement the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. The existing Link light rail operations and maintenance facility (OMF) in Seattle is currently configured to serve up to 104 vehicles. The project is needed because the existing OMF site cannot store, maintain, or deploy the expanded fleet of vehicles. The light rail vehicle acquisition and delivery schedule requires additional capacity to be operational by the end of 2020.

An Environmental Scoping Information Report provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at [www.soundtransit.org/OMSF](http://www.soundtransit.org/OMSF)

#### **Initiation of Section 106 Consultation**

We are initiating this consultation under Section 106 of the National Historic Preservation Act of 1966 and its associated regulations to help us identify places that may have traditional religious and cultural importance to your tribal organization. Please note that we are requesting information only on such



places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We are also interested in potentially affected places of historical significance to your tribe.

### **Invitation to Participate in Environmental Review Process**

In addition, Section 6002 of the federal Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), establishes an enhanced environmental review process for certain FTA projects, such as the OMSF Project. The Suquamish Tribe may have a potential interest due to the possibility of cultural resources and fisheries in the project area; accordingly, FTA invites the tribe to become a participating agency.

As a participating agency, you will be asked to:

- Participate in the project's environment review process (starting in the scoping process), by reviewing and commenting on the purpose and need statement, range of alternatives, probable significant impacts, potential impacts and mitigation measures;
- Identify, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts; and
- Provide meaningful and timely input on unresolved issues, as needed.


Designation as a "participating agency" does not imply that the tribe supports the proposed project or has any jurisdiction over or special expertise concerning it. In order to appropriately involve your tribe in consultation efforts related to this project, we request a written response to this invitation. **Please complete the enclosed Participating Agency Designation form to accept or decline this invitation by October 22, 2012.**

### **Scoping Meeting**

FTA and Sound Transit invite you to attend the scoping meeting for tribes and agencies on October 9, 2012 at Sound Transit's Ruth Fischer Boardroom, Union Station, 401 S. Jackson Street, Seattle, Washington, 98104, from 1:00 to 3:00 p.m. The scoping comment period begins on September 21, 2012 and ends October 22, 2012. Scoping comments are requested on the project's preliminary Purpose and Need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be included in the EIS.

If you have questions regarding this invitation, please contact Dan Drais, FTA Region 10 Environmental Protection Specialist, at (206) 220-4465 or [Daniel.Drais@dot.gov](mailto:Daniel.Drais@dot.gov).

Sincerely,

  
for R.F. Krochalis  
Regional Administrator

Enclosure: Participating Agency Designation Form

cc (by email): Dennis Lewarch, Suquamish Tribe, THPO  
Allyson Brooks, SHPO  
Kent Hale, Sound Transit



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

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Seattle, WA 98174-1002  
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206-220-7959 (fax)

September 19, 2012

The Hon. Shelley Burch, Tribal Chair  
Snoqualmie Tribe  
8130 Railroad Ave SE, PO Box 969  
Snoqualmie, WA 98065

**Subject: Sound Transit Link Operations & Maintenance Satellite Facility Project:  
Initiation of Section 106 Consultation, Invitation to Participate in the Environmental  
Review Process, and Scoping Notice**

Dear Chairwoman Burch:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Link light rail Operations & Maintenance Satellite Facility (OMSF), pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency for SEPA compliance.

The project seeks to identify and evaluate alternative sites for a new OMSF. The alternative sites are located in the cities of Bellevue and Lynnwood in King and Snohomish counties, Washington. A fleet of approximately 180 vehicles is needed to implement the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. The existing Link light rail operations and maintenance facility (OMF) in Seattle is currently configured to serve up to 104 vehicles. The project is needed because the existing OMF site cannot store, maintain, or deploy the expanded fleet of vehicles. The light rail vehicle acquisition and delivery schedule requires additional capacity to be operational by the end of 2020.

An Environmental Scoping Information Report provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at [www.soundtransit.org/OMSF](http://www.soundtransit.org/OMSF).

#### **Initiation of Section 106 Consultation**

We are initiating this consultation under Section 106 of the National Historic Preservation Act of 1966 and its associated regulations to help us identify places that may have traditional religious and cultural importance to your tribal organization. Please note that we are requesting information only on such



places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We are also interested in potentially affected places of historical significance to your tribe.

### **Invitation to Participate in Environmental Review Process**

In addition, Section 6002 of the federal Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), establishes an enhanced environmental review process for certain FTA projects, such as the OMSF Project. The Snoqualmie Tribe may have a potential interest due to the possibility of cultural resources and fisheries in the project area; accordingly, FTA invites the tribe to become a participating agency.

As a participating agency, you will be asked to:

- Participate in the project's environment review process (starting in the scoping process), by reviewing and commenting on the purpose and need statement, range of alternatives, probable significant impacts, potential impacts and mitigation measures;
- Identify, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts; and
- Provide meaningful and timely input on unresolved issues, as needed.

Designation as a "participating agency" does not imply that the tribe supports the proposed project or has any jurisdiction over or special expertise concerning it. In order to appropriately involve your tribe in consultation efforts related to this project, we request a written response to this invitation. **Please complete the enclosed Participating Agency Designation form to accept or decline this invitation by October 22, 2012.**

### **Scoping Meeting**

FTA and Sound Transit invite you to attend the scoping meeting for tribes and agencies on October 9, 2012 at Sound Transit's Ruth Fischer Boardroom, Union Station, 401 S. Jackson Street, Seattle, Washington, 98104, from 1:00 to 3:00 p.m. The scoping comment period begins on September 21, 2012 and ends October 22, 2012. Scoping comments are requested on the project's preliminary Purpose and Need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be included in the EIS.

If you have questions regarding this invitation, please contact Dan Drais, FTA Region 10 Environmental Protection Specialist, at (206) 220-4465 or [Daniel.Drais@dot.gov](mailto:Daniel.Drais@dot.gov).

Sincerely,



*for* R.F. Krochalis  
Regional Administrator

Enclosure: Participating Agency Designation Form

cc (by email): Steve Mullen Moses, Snoqualmie Tribe  
Allyson Brooks, SHPO  
Kent Hale, Sound Transit



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION X  
Alaska, Idaho, Oregon,  
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Seattle, WA 98174-1002  
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206-220-7959 (fax)

September 19, 2012

The Hon. Virginia Cross, Tribal Chair  
Muckleshoot Indian Tribe  
39015 172nd Ave SE  
Auburn, WA 98092

**Subject: Sound Transit Link Operations & Maintenance Satellite Facility Project:**  
Initiation of Section 106 Consultation, Invitation to Participate in the Environmental Review  
Process, and Scoping Notice

Dear Chairperson Cross:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Link light rail Operations & Maintenance Satellite Facility (OMSF), pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency for SEPA compliance.

The project seeks to identify and evaluate alternative sites for a new OMSF. The alternative sites are located in the cities of Bellevue and Lynnwood in King and Snohomish counties, Washington. A fleet of approximately 180 vehicles is needed to implement the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. The existing Link light rail operations and maintenance facility (OMF) in Seattle is currently configured to serve up to 104 vehicles. The project is needed because the existing OMF site cannot store, maintain, or deploy the expanded fleet of vehicles. The light rail vehicle acquisition and delivery schedule requires additional capacity to be operational by the end of 2020.

An Environmental Scoping Information Report provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at [www.soundtransit.org/OMSF](http://www.soundtransit.org/OMSF)

#### **Initiation of Section 106 Consultation**

We are initiating this consultation under Section 106 of the National Historic Preservation Act of 1966 and its associated regulations to help us identify places that may have traditional religious and cultural



importance to your tribal organization. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We are also interested in potentially affected places of historical significance to your tribe.

### **Invitation to Participate in Environmental Review Process**

In addition, Section 6002 of the federal Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), establishes an enhanced environmental review process for certain FTA projects, such as the OMSF Project. The Muckleshoot Indian Tribe may have a potential interest due to the possibility of cultural resources and fisheries in the project area; accordingly, FTA invites the tribe to become a participating agency.

As a participating agency, you will be asked to:

- Participate in the project's environment review process (starting in the scoping process), by reviewing and commenting on the purpose and need statement, range of alternatives, probable significant impacts, potential impacts and mitigation measures;
- Identify, as early as practicable, any issues of concern regarding the project's potential environmental or socioeconomic impacts; and
- Provide meaningful and timely input on unresolved issues, as needed.

Designation as a "participating agency" does not imply that the tribe supports the proposed project or has any jurisdiction over or special expertise concerning it. In order to appropriately involve your tribe in consultation efforts related to this project, we request a written response to this invitation. **Please complete the enclosed Participating Agency Designation form to accept or decline this invitation by October 22, 2012.**


### **Scoping Meeting**

FTA and Sound Transit invite you to attend the scoping meeting for tribes and agencies on October 9, 2012 at Sound Transit's Ruth Fischer Boardroom, Union Station, 401 S. Jackson Street, Seattle, Washington, 98104, from 1:00 to 3:00 p.m. The scoping comment period begins on September 21, 2012 and ends October 22, 2012. Scoping comments are requested on the project's preliminary Purpose and Need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be included in the EIS.

If you have questions regarding this invitation, please contact Dan Drais, FTA Region 10 Environmental Protection Specialist, at (206) 220-4465 or [Daniel.Drais@dot.gov](mailto:Daniel.Drais@dot.gov).

Sincerely,



 R.F. Krochalis  
Regional Administrator

Enclosure: Participating Agency Designation Form

cc (by email): Laura Murphy, Muckleshoot Indian Tribe  
Karen Walter, Muckleshoot Indian Tribe  
Allyson Brooks, SHPO  
Kent Hale, Sound Transit



**Initiation of Section 106  
Consultation and Scoping Notice  
October 2, 2012**

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- Duwamish
- Snohomish





October 2, 2012

Michael Evans, Tribal Chair  
Snohomish Tribe  
11014 19th Ave SE, Ste. #8, PMB #101  
Everett, WA 98208-5121

Subject: **Sound Transit Operations & Maintenance Satellite Facility Project:**  
Initiation of Section 106 Consultation and Scoping Notice

Dear Chair Evans:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Link Light Rail Operations & Maintenance Satellite Facility (OMSF) Project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency for SEPA compliance and has issued the enclosed SEPA Determination of Significance (DS).

The project seeks to identify and evaluate alternative sites for a new OMSF. The alternative sites are located in the cities of Bellevue and Lynnwood in King and Snohomish counties, Washington. A fleet of approximately 180 vehicles is needed to implement the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. The existing Link light rail operations and maintenance facility (OMF) in Seattle is currently configured to serve up to 104 vehicles. The project is needed because the existing OMF site cannot store, maintain, or deploy the expanded fleet of vehicles. The light rail vehicle acquisition and delivery schedule requires additional capacity to be operational by the end of 2020.

An Environmental Scoping Information Report provides additional information, a map of possible alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary Purpose and Need Statement. This report, along with the Draft Coordination Plan, and other project information can be reviewed on the Sound Transit website at [www.soundtransit.org/OMSF](http://www.soundtransit.org/OMSF).

### **Initiation of Section 106 Consultation**

We are initiating this consultation under Section 106 of the National Historic Preservation Act of 1966 and its associated regulations to help us identify places that may have traditional religious and cultural importance to your tribal organization. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We are also interested in potentially affected places of historical significance to your tribe.

#### **CHAIR**

**Pat McCarthy**  
*Pierce County Executive*

#### **VICE CHAIRS**

**Julia Patterson**  
*King County Councilmember*

**Aaron Reardon**  
*Snohomish County Executive*

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*Tacoma Mayor*

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*King County Councilmember*

#### **CHIEF EXECUTIVE OFFICER**

**Joni Earl**

## Scoping

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If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, please call me at 206/398-5103 or [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,

Kent Hale  
Senior Environmental Planner

Cc: Mike Williams, Sound Transit  
Dan Drais, FTA Region 10

Enclosures: SEPA DS



October 2, 2012

Cecile A. Hansen, Tribal Chair  
Duwamish Tribe  
4705 W Marginal Way SW  
Seattle, WA 98106

Subject: **Sound Transit Operations & Maintenance Satellite Facility Project:**  
Initiation of Section 106 Consultation and Scoping Notice

Dear Chair Hansen:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the proposed Link Light Rail Operations & Maintenance Satellite Facility (OMSF) Project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). Sound Transit will be the lead agency for SEPA compliance and has issued the enclosed SEPA Determination of Significance (DS).

The project seeks to identify and evaluate alternative sites for a new OMSF. The alternative sites are located in the cities of Bellevue and Lynnwood in King and Snohomish counties, Washington. A fleet of approximately 180 vehicles is needed to implement the regional light rail system expansion called for in the voter approved Sound Transit 2 (ST2) Plan. The existing Link light rail operations and maintenance facility (OMF) in Seattle is currently configured to serve up to 104 vehicles. The project is needed because the existing OMF site cannot store, maintain, or deploy the expanded fleet of vehicles. The light rail vehicle acquisition and delivery schedule requires additional capacity to be operational by the end of 2020.

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### **Initiation of Section 106 Consultation**

We are initiating this consultation under Section 106 of the National Historic Preservation Act of 1966 and its associated regulations to help us identify places that may have traditional religious and cultural importance to your tribal organization. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project so that we may try to avoid impacts. We are also interested in potentially affected places of historical significance to your tribe.

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## Scoping

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If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, please call me at 206/398-5103 or [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,

Kent Hale  
Senior Environmental Planner

Cc: Mike Williams, Sound Transit  
Dan Drais, FTA Region 10

Enclosures: SEPA DS

## **OMSF EIS Methodologies for Review**

### **January 14, 2013**

---

- 1/14/13 letter to agencies and tribes



**From:** Hale, Kent  
**To:** [Kent Hale](#)  
**Bcc:** [Salomone, Chris](#); ["pkrauss@ci.lynnwood.wa.us"](#); ["dkleitsch@ci.lynnwood.wa.us"](#); [VanDeKamp, Bernard](#); ["JPFUNDT@REDMOND.GOV"](#); ["Gary.Kriedt@kingcounty.gov"](#); [Desmond, Kevin](#); [Williams, Michael](#); [james.saxton@dot.gov](#); ["public.works@co.snohomish.wa.us"](#); ["steve.dickson@snoco.org"](#); [Kent Hale](#); ["matthew.j.bennett@usace.army.mil"](#); ["mhyres@edmonds.wednet.edu"](#); ["isum461@ecy.wa.gov"](#); ["Somers.Elaine@epamail.epa.gov"](#); ["Willie Taylor@los.doi.gov"](#); ["mark.eberlein@dhs.gov"](#); [Matthew.Sterner@DAHP.WA.GOV](#); ["shope@ci.mt.wa.us"](#); [Larry.Fisher@dfw.wa.gov](#); ["Counts, Dylan \(CountsD@wsdot.wa.gov\)"](#); [Paul Krueger \(kruegep@wsdot.wa.gov\)"](#); ["laura.murphy@muckleshoot.nsn.us"](#); [karen.walter@muckleshoot.nsn.us"](#); ["steve@snoqualmilenation.com"](#); ["chair@snohomishtribe.com"](#); [DTS@qwestoffice.net](#); ["dlewarch@suquamish.nsn.us"](#); ["ryoung@tulaliptribes-nsn.gov"](#); [johnson@yakama.com](#)  
**Subject:** ST OMSF - EIS Methodologies for Review  
**Date:** Monday, January 14, 2013 5:54:00 PM  
**Attachments:** [OMSF EISMethodology Comments.xlsx](#)  
[OMSF EISMethods Agencyletter1-14-13.pdf](#)

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January 14, 2013

**TO:** Sound Transit Operations & Maintenance Satellite Facility (OMSF) Project Participating Agency Staff

**Subject:** Invitation to Review Technical Methodologies for the OMSF Environmental Impact Statement (EIS)

Dear Agency/Tribal Staff:

In September 2012, FTA and Sound Transit invited your agency or tribal government to participate in the environmental review process for Sound Transit's Link Operations and Maintenance Satellite Facility (OMSF), consistent with provisions of 23 U.S.C. § 139 and 23 C.F.R. §771.111.

Environmental scoping was completed in October 2012, and the Sound Transit Board identified alternatives to study in the Environmental Impact Statement (EIS) in December 2012.

At this time, Sound Transit invites your agency to review the methodologies proposed for the environmental analysis in the EIS. The document is being prepared as a combined NEPA/SEPA EIS, and will include the following topic areas:

- Acquisitions, Displacements, and Relocations
- Air Quality and Greenhouse Gas Emissions
- Economics
- Ecosystem Resources
- Electromagnetic Fields
- Energy
- Environmental Justice
- Geology and Soils
- Hazardous Materials
- Historic and Archaeological Resources
- Land Use
- Noise and Vibration
- Parks and Recreation
- Public Services, Safety, and Security
- Section 4(f)/6(f) Evaluation
- Social Impacts, Community Facilities, and Neighborhoods
- Transportation

- Utility
- Visual Quality
- Water Resources

The proposed technical methodologies address these topic areas. Please review and comment on those topic areas of interest or within your agency's area of expertise. The draft Methodology Report is available to download at the following project SharePoint site:

<https://sharepoint.soundtransit.org/sites/LLRMSPA/WF/Participating%20Agencies/Forms/AllItems.aspx>

Please use the following credentials to log in and download the report:

Username: agency\OMSF\_Agency

Password: OM\$F\_2013

The comment form is attached to this email and also available at the SharePoint site (OMSF\_EISMethodology\_Comments.xlsx). Please forward this information to appropriate staff within your agency. If you have any difficulty accessing this site, please let me know.

Please provide your agency's consolidated comments within this form, and send via e-mail to [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org) by Wednesday **February 13, 2013**. Sound Transit and consultant staff are available to meet with you to discuss the methodologies during the comment period at your request.

After receipt of comments from all agencies and tribes, Sound Transit will revise the methodologies as appropriate and make the final methodology report available.

If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, please call me at 206/398-5103 or [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,

Kent Hale, AICP  
Senior Environmental Planner  
Sound Transit  
401 S. Jackson Street  
Seattle, WA 98104-2826





January 14, 2013

TO: Sound Transit Operations & Maintenance Satellite Facility (OMSF) Project  
Participating Agency Staff

Subject: Invitation to Review Technical Methodologies for the OMSF Environmental  
Impact Statement (EIS)

Dear Agency/Tribal Staff:

In September 2012, FTA and Sound Transit invited your agency or tribal government to participate in the environmental review process for Sound Transit's Link Operations and Maintenance Satellite Facility (OMSF), consistent with provisions of 23 U.S.C. § 139 and 23 C.F.R. § 771.111. Environmental scoping was completed in October 2012, and the Sound Transit Board identified alternatives to study in the Environmental Impact Statement (EIS) in December 2012.

At this time, Sound Transit invites your agency to review the methodologies proposed for the environmental analysis in the EIS. The document is being prepared as a combined NEPA/SEPA EIS, and will include the following topic areas:

- Acquisitions, Displacements, and Relocations
- Air Quality and Greenhouse Gas Emissions
- Economics
- Ecosystem Resources
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- Environmental Justice
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- Hazardous Materials
- Historic and Archaeological Resources
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- Noise and Vibration
- Parks and Recreation
- Public Services, Safety, and Security
- Section 4(f)/6(f) Evaluation
- Social Impacts, Community Facilities, and Neighborhoods
- Transportation
- Utility
- Visual Quality
- Water Resources

**CHAIR**

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**CHIEF EXECUTIVE OFFICER**

**Joni Earl**

The proposed technical methodologies address these topic areas. Please review and comment on those topic areas of interest or within your agency's area of expertise. The draft Methodology Report is available to download at the following project SharePoint site:

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Please use the following credentials to log in and download the report:

Username: agency\OMSF\_Agency

Password: OM\$F\_2013

Please also download the comment form available at this site (OMSF\_EISMethodology\_Comments.xlsx). Please forward this information to appropriate staff within your agency.

Please provide your agency's consolidated comments within this form, and send via e-mail to [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org) by Wednesday **February 13, 2013**. Sound Transit and consultant staff are available to meet with you to discuss the methodologies during the comment period at your request.

After receipt of comments from all agencies and tribes, Sound Transit will revise the methodologies as appropriate and make the final methodology report available.

If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, please call me at 206/398-5103 or [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,

Kent Hale, AICP  
Senior Environmental Planner  
Sound Transit  
401 S. Jackson Street  
Seattle, WA 98104-2826

**APE Request For Concurrence Letter to DAHP**  
**March 3, 2013**

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U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION X  
Alaska, Idaho, Oregon,  
Washington

915 Second Avenue  
Federal Bldg. Suite 3142  
Seattle, WA 98174-1002  
206-220-7954  
206-220-7959 (fax)

March 3, 2013

Allyson Brooks, Ph.D.  
State Historic Preservation Officer  
Department of Archaeology and Historic Preservation  
PO Box 48343  
Olympia, WA 98504-8343

**Re: Sound Transit Link Operations and Maintenance Satellite Facility (OMSF)  
Request for Concurrence on Proposed Area of Potential Effects**

Dear Dr. Brooks:

In a letter dated September 19, 2012, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Sound Transit Link Operations and Maintenance Satellite Facility (OMSF) project. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. At this time, we seek your comments and concurrence on the proposed APE. A request for comment has been sent to consulting tribes for this project as well.

**Project Description**

As described in the September 19, 2012 letter and supplemental documents, the project seeks to evaluate alternatives for a new OMSF to serve the increased light rail fleet needed to implement the regional light rail system expansion. Four alternatives have been identified for evaluation in the EIS. The alternatives include:

- **Alternative 1 – Lynnwood:** The Lynnwood site is approximately 35 acres. The site is located north of Interstate 5 and east of 52<sup>nd</sup> Avenue West/Cedar Valley Road in the City of Lynnwood. Alternative 1 also includes storage tracks and an operator facility in the former Burlington Northern Santa Fe (BNSF) railroad corridor in the City of Bellevue, north of Northeast 12<sup>th</sup> Street.
- **Alternative 2 – BNSF:** The BNSF site is approximately 28 acres. The site is located south of State Route (SR) 520 and north of Northeast 12<sup>th</sup> Street on the east side of the former BNSF railway corridor, west of 120<sup>th</sup> Avenue Northeast in the City of Bellevue.



- **Alternative 3 – BNSF Modified:** the BNSF Modified site is approximately 35 acres. The site is located on the west and east side of the former BNSF railway corridor. It is located east of 116<sup>th</sup> Avenue Northeast and west of 120<sup>th</sup> Avenue Northeast; south of SR 520 and north of Northeast 12<sup>th</sup> Street in the City of Bellevue.
- **Alternative 4 – SR 520:** The SR 520 site is approximately 29 acres. The site is located in the City of Bellevue and is bounded by SR 520 to the north and Northup Way/Northeast 20<sup>th</sup> Street to the south. It is located east of 130<sup>th</sup> Avenue Northeast and west of 140<sup>th</sup> Avenue Northeast.

### **Proposed APE**

The enclosed maps illustrate the proposed APE for the project. It includes all areas where the project could potentially affect National Register of Historic Places (NRHP) eligible historic or archaeological resources.

The proposed APE consists of the area within the boundaries of the OMSF site alternatives, the area within 200 feet of the boundaries of OMSF site alternatives, and any ancillary facilities constructed as part of the project. It also includes buffers within approximately 200 feet of construction staging areas. For archaeological resource investigations, the APE is proposed to be limited to the area that will be disturbed in constructing the project, including lead track, ancillary facilities, and construction staging areas.

### **Request for Concurrence**

Pursuant to Section 106 of the National Historic Preservation Act, we request your concurrence with the proposed APE as described above and illustrated in the enclosed maps.

We look forward to your response on the proposed APE. If you have questions, or need additional information, please contact Steve Saxton at (206) 220-4311 or by email [James.Saxton@dot.gov](mailto:James.Saxton@dot.gov). The Sound Transit contact for this project is Kent Hale who can be reached at (206) 398-5103 or at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org). Thank you for your assistance.

Sincerely,



Elaine Wine

Director, Operations and Program Management

Enclosure: APE Maps

cc: Matthew Sterner, DAHP  
Kent Hale, Sound Transit

## **APE Request for Comments Letter**

### **March 25, 2013**

---

- Duwamish
- Snohomish





March 25, 2013

Michael Evans  
Tribal Chair  
Snohomish Tribe  
11014 19<sup>th</sup> Avenue SE, Ste. #8, PMP #101  
Everett, WA 98208-5121

**Re: Sound Transit Link Operations and Maintenance Satellite Facility (OMSF)  
Request for Comments on Proposed Area of Potential Effects**

Dear Chair Evans:

In a letter dated October 2, 2012 Sound Transit initiated consultation under Section 106 of the National Historic Preservation Act for the Sound Transit Link Operations and Maintenance Satellite Facility (OMSF) project. Since the initiation of consultation, the Federal Transit Administration (FTA) and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. At this time, we respectfully seek your comments on the proposed APE.

The project and proposed APE are described below. We would be pleased to discuss any concerns you may have regarding the project.

**Project Description**

As described in the October 2, 2012 letter and supplemental documents, the project seeks to evaluate alternatives for a new OMSF to serve the increased light rail fleet needed to implement the regional light rail system expansion. Four alternatives have been identified for evaluation in the EIS. The alternatives include:

- **Alternative 1 – Lynnwood:** The Lynnwood site is approximately 35 acres. The site is located north of Interstate 5 and east of 52<sup>nd</sup> Avenue West/Cedar Valley Road in the City of Lynnwood. Alternative 1 also includes storage tracks and an operator facility in the former Burlington Northern Santa Fe (BNSF) railroad corridor in the City of Bellevue, north of Northeast 12<sup>th</sup> Street.
- **Alternative 2 – BNSF:** The BNSF site is approximately 28 acres. The site is located south of State Route (SR) 520 and north of Northeast 12<sup>th</sup> Street on the east side of the former BNSF railway corridor, west of 120<sup>th</sup> Avenue Northeast in the City of Bellevue.
- **Alternative 3 – BNSF Modified:** the BNSF Modified site is approximately 35 acres. The site is located on the west and east side of the former BNSF railway corridor. It is located east of 116<sup>th</sup> Avenue Northeast and west of 120<sup>th</sup> Avenue Northeast; south of SR 520 and north of Northeast 12<sup>th</sup> Street in the City of Bellevue.
- **Alternative 4 – SR 520:** The SR 520 site is approximately 29 acres. The site is located in the City of Bellevue and is bounded by SR 520 to the north and Northup Way/Northeast 20<sup>th</sup> Street to the south. It is located east of 130<sup>th</sup> Avenue Northeast and west of 140<sup>th</sup> Avenue Northeast.

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*Pierce County Executive*

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**CHIEF EXECUTIVE OFFICER**

**Joni Earl**

**Proposed APE**

The enclosed maps illustrate the proposed APE for the project. The proposed APE includes all areas where the project could potentially affect National Register of Historic Places (NRHP) eligible historic or archaeological resources.

The proposed APE consists of the area within 200 feet of the boundaries of OMSF site alternatives and any ancillary facilities constructed as part of the project. It also includes buffers within approximately 200 feet of construction staging areas. For archaeological resource investigations, the APE is proposed to be limited to the area that will be disturbed in constructing the project, including lead track, ancillary facilities, and construction staging areas.

**Request for Comments**

Pursuant to Section 106 of the National Historic Preservation Act, we invite you to comment on the proposed APE and inform us of any known potential cultural resources within or near the APE. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project. We are also interested in potentially affected places of historical significance to your tribe.

Your timely response will greatly help us incorporate your comments into the project development. For that purpose, we respectfully request that any comments are provided within 30 days.

We look forward to your comments on the proposed APE. If you have questions, or need additional information, please contact Kent Hale at (206) 398-5103 or at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org)

Sincerely,

Kent Hale  
Senior Environmental Planner

Enclosure:      APE Maps

cc:                Steve Saxton, FTA Region 10





March 25, 2013

Cecile A. Hansen  
Tribal Chair  
Duwamish Tribe  
4705 W Marginal Way SW  
Seattle, WA 98106

**Re: Sound Transit Link Operations and Maintenance Satellite Facility (OMSF)  
Request for Comments on Proposed Area of Potential Effects**

Dear Chair Hansen:

In a letter dated October 2, 2012 Sound Transit initiated consultation under Section 106 of the National Historic Preservation Act for the Sound Transit Link Operations and Maintenance Satellite Facility (OMSF) project. Since the initiation of consultation, the Federal Transit Administration (FTA) and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. At this time, we respectfully seek your comments on the proposed APE.

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**Project Description**

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- **Alternative 1 – Lynnwood:** The Lynnwood site is approximately 35 acres. The site is located north of Interstate 5 and east of 52<sup>nd</sup> Avenue West/Cedar Valley Road in the City of Lynnwood. Alternative 1 also includes storage tracks and an operator facility in the former Burlington Northern Santa Fe (BNSF) railroad corridor in the City of Bellevue, north of Northeast 12<sup>th</sup> Street.
- **Alternative 2 – BNSF:** The BNSF site is approximately 28 acres. The site is located south of State Route (SR) 520 and north of Northeast 12<sup>th</sup> Street on the east side of the former BNSF railway corridor, west of 120<sup>th</sup> Avenue Northeast in the City of Bellevue.
- **Alternative 3 – BNSF Modified:** the BNSF Modified site is approximately 35 acres. The site is located on the west and east side of the former BNSF railway corridor. It is located east of 116<sup>th</sup> Avenue Northeast and west of 120<sup>th</sup> Avenue Northeast; south of SR 520 and north of Northeast 12<sup>th</sup> Street in the City of Bellevue.
- **Alternative 4 – SR 520:** The SR 520 site is approximately 29 acres. The site is located in the City of Bellevue and is bounded by SR 520 to the north and Northup Way/Northeast 20<sup>th</sup> Street to the south. It is located east of 130<sup>th</sup> Avenue Northeast and west of 140<sup>th</sup> Avenue Northeast.

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**Joni Earl**

**Proposed APE**

The enclosed maps illustrate the proposed APE for the project. The proposed APE includes all areas where the project could potentially affect National Register of Historic Places (NRHP) eligible historic or archaeological resources.

The proposed APE consists of the area within 200 feet of the boundaries of OMSF site alternatives and any ancillary facilities constructed as part of the project. It also includes buffers within approximately 200 feet of construction staging areas. For archaeological resource investigations, the APE is proposed to be limited to the area that will be disturbed in constructing the project, including lead track, ancillary facilities, and construction staging areas.

**Request for Comments**

Pursuant to Section 106 of the National Historic Preservation Act, we invite you to comment on the proposed APE and inform us of any known potential cultural resources within or near the APE. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project. We are also interested in potentially affected places of historical significance to your tribe.

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We look forward to your comments on the proposed APE. If you have questions, or need additional information, please contact Kent Hale at (206) 398-5103 or at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org)

Sincerely,

Kent Hale  
Senior Environmental Planner

Enclosure:      APE Maps

cc:                Steve Saxton, FTA Region 10

## **APE Request for Comments Letter**

### **April 3, 2013**

---

- Muckleshoot
- Snoqualmie
- Suquamish
- Tulalip
- Yakama





U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION X  
Alaska, Idaho, Oregon,  
Washington

915 Second Avenue  
Federal Bldg. Suite 3142  
Seattle, WA 98174-1002  
206-220-7954  
206-220-7959 (fax)

April 3, 2013

Harry Smiskin  
Tribal Chair  
Confederated Tribes and Bands of the Yakama Indian Nation  
PO Box 151  
Toppenish, WA 98948

**Re: Sound Transit Link Operations and Maintenance Satellite Facility (OMSF)  
Request for Comments on Proposed Area of Potential Effects**

The Honorable Harry Smiskin:

In a letter dated September 19, 2012, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Sound Transit Link Operations and Maintenance Satellite Facility (OMSF) project. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. At this time, we respectfully seek your comments on the proposed APE.

The project and proposed APE are described below. We would be pleased to discuss any concerns you may have regarding the project.

**Project Description**

As described in the September 19, 2012 letter and supplemental documents, the project seeks to evaluate alternatives for a new OMSF to serve the increased light rail fleet needed to implement the regional light rail system expansion. Four alternatives have been identified for evaluation in the EIS. The alternatives include:

- **Alternative 1 – Lynnwood:** The Lynnwood site is approximately 35 acres. The site is located north of Interstate 5 and east of 52<sup>nd</sup> Avenue West/Cedar Valley Road in the City of Lynnwood. Alternative 1 also includes storage tracks and an operator facility in the former Burlington Northern Santa Fe (BNSF) railroad corridor in the City of Bellevue, north of Northeast 12<sup>th</sup> Street.
- **Alternative 2 – BNSF:** The BNSF site is approximately 28 acres. The site is located south of State Route (SR) 520 and north of Northeast 12<sup>th</sup> Street on the east side of the former BNSF railway corridor, west of 120<sup>th</sup> Avenue Northeast in the City of Bellevue.



- **Alternative 3 – BNSF Modified:** the BNSF Modified site is approximately 35 acres. The site is located on the west and east side of the former BNSF railway corridor. It is located east of 116<sup>th</sup> Avenue Northeast and west of 120<sup>th</sup> Avenue Northeast; south of SR 520 and north of Northeast 12<sup>th</sup> Street in the City of Bellevue.
- **Alternative 4 – SR 520:** The SR 520 site is approximately 29 acres. The site is located in the City of Bellevue and is bounded by SR 520 to the north and Northup Way/Northeast 20<sup>th</sup> Street to the south. It is located east of 130<sup>th</sup> Avenue Northeast and west of 140<sup>th</sup> Avenue Northeast.

### **Proposed APE**

The enclosed maps illustrate the proposed APE for the project. The proposed APE includes all areas where the project could potentially affect National Register of Historic Places (NRHP) eligible historic or archaeological resources.

The proposed APE consists of the area within the boundaries of the OMSF site alternatives, the area within 200 feet of the boundaries of OMSF site alternatives, and any ancillary facilities constructed as part of the project. It also includes buffers within approximately 200 feet of construction staging areas. For archaeological resource investigations, the APE is proposed to be limited to the area that will be disturbed in constructing the project, including the lead track, ancillary facilities, and construction staging areas.

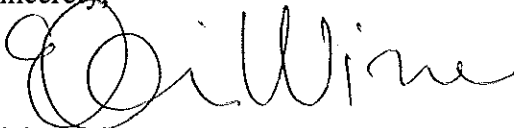
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Your timely response will greatly help us incorporate your comments into the project development. For that purpose, we respectfully request that any comments are provided within 30 days.

We look forward to your comments on the proposed APE. If you have questions, or need additional information, please contact Steve Saxton at (206) 220-4311 or by email [James.Saxton@dot.gov](mailto:James.Saxton@dot.gov). The Sound Transit contact for this project is Kent Hale who can be reached at (206) 398-5103 or at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,



Elaine Wine  
Director, Operations and Program Management

Enclosure: APE Maps

cc: Kate Valdez, THPO, Confederated Tribes and Bands of the Yakama Indian Reservation  
Philip Ridgon, Natural Resources, Confederated Tribes and Bands of the Yakama Indian Reservation  
Matthew Sterner, Department of Archaeology and Historic Preservation  
Kent Hale, Sound Transit



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

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Seattle, WA 98174-1002  
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206-220-7959 (fax)

April 3, 2013

Melvin Sheldon, Jr.  
Tribal Chair  
Tulalip Tribes of Washington  
6406 Marine Drive Northwest  
Tulalip, WA 98271

**Re: Sound Transit Link Operations and Maintenance Satellite Facility (OMSF)  
Request for Comments on Proposed Area of Potential Effects**

The Honorable Melvin Sheldon, Jr.:

In a letter dated September 19, 2012, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Sound Transit Link Operations and Maintenance Satellite Facility (OMSF) project. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. At this time, we respectfully seek your comments on the proposed APE.

The project and proposed APE are described below. We would be pleased to discuss any concerns you may have regarding the project.

**Project Description**

As described in the September 19, 2012 letter and supplemental documents, the project seeks to evaluate alternatives for a new OMSF to serve the increased light rail fleet needed to implement the regional light rail system expansion. Four alternatives have been identified for evaluation in the EIS. The alternatives include:

- **Alternative 1 – Lynnwood:** The Lynnwood site is approximately 35 acres. The site is located north of Interstate 5 and east of 52<sup>nd</sup> Avenue West/Cedar Valley Road in the City of Lynnwood. Alternative 1 also includes storage tracks and an operator facility in the former Burlington Northern Santa Fe (BNSF) railroad corridor in the City of Bellevue, north of Northeast 12<sup>th</sup> Street.
- **Alternative 2 – BNSF:** The BNSF site is approximately 28 acres. The site is located south of State Route (SR) 520 and north of Northeast 12<sup>th</sup> Street on the east side of the former BNSF railway corridor, west of 120<sup>th</sup> Avenue Northeast in the City of Bellevue.

- **Alternative 3 – BNSF Modified:** the BNSF Modified site is approximately 35 acres. The site is located on the west and east side of the former BNSF railway corridor. It is located east of 116<sup>th</sup> Avenue Northeast and west of 120<sup>th</sup> Avenue Northeast; south of SR 520 and north of Northeast 12<sup>th</sup> Street in the City of Bellevue.
- **Alternative 4 – SR 520:** The SR 520 site is approximately 29 acres. The site is located in the City of Bellevue and is bounded by SR 520 to the north and Northup Way/Northeast 20<sup>th</sup> Street to the south. It is located east of 130<sup>th</sup> Avenue Northeast and west of 140<sup>th</sup> Avenue Northeast.

### **Proposed APE**

The enclosed maps illustrate the proposed APE for the project. The proposed APE includes all areas where the project could potentially affect National Register of Historic Places (NRHP) eligible historic or archaeological resources.

The proposed APE consists of the area within the boundaries of the OMSF site alternatives, the area within 200 feet of the boundaries of OMSF site alternatives, and any ancillary facilities constructed as part of the project. It also includes buffers within approximately 200 feet of construction staging areas. For archaeological resource investigations, the APE is proposed to be limited to the area that will be disturbed in constructing the project, including the lead track, ancillary facilities, and construction staging areas.

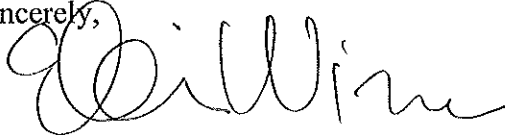
### **Request for Comments**

Pursuant to Section 106 of the National Historic Preservation Act, we invite you to comment on the proposed APE and inform us of any known potential cultural resources within or near the APE. Please note that we are requesting information only on such places that you believe may be impacted by the proposed project. We are also interested in potentially affected places of historical significance to your tribe.

Your timely response will greatly help us incorporate your comments into the project development. For that purpose, we respectfully request that any comments are provided within 30 days.

We look forward to your comments on the proposed APE. If you have questions, or need additional information, please contact Steve Saxton at (206) 220-4311 or by email [James.Saxton@dot.gov](mailto:James.Saxton@dot.gov). The Sound Transit contact for this project is Kent Hale who can be reached at (206) 398-5103 or at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,



Elaine Wine  
Director, Operations and Program Management

Enclosure: APE Maps

cc: Richard Young, Cultural Resources, Tulalip Tribes of Washington  
Kurt Nelson, Natural Resources, Tulalip Tribes of Washington  
Matthew Sterner, Department of Archaeology and Historic Preservation  
Kent Hale, Sound Transit



U.S. Department  
of Transportation  
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206-220-7959 (fax)

April 3, 2013

Leonard Forsman  
Tribal Chair  
Suquamish Indian Tribe of the Port Madison Reservation  
PO Box 498  
Suquamish, WA 98392-0498

**Re: Sound Transit Link Operations and Maintenance Satellite Facility (OMSF)  
Request for Comments on Proposed Area of Potential Effects**

The Honorable Leonard Forsman:

In a letter dated September 19, 2012, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Sound Transit Link Operations and Maintenance Satellite Facility (OMSF) project. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. At this time, we respectfully seek your comments on the proposed APE.

The project and proposed APE are described below. We would be pleased to discuss any concerns you may have regarding the project.

**Project Description**

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- **Alternative 1 – Lynnwood:** The Lynnwood site is approximately 35 acres. The site is located north of Interstate 5 and east of 52<sup>nd</sup> Avenue West/Cedar Valley Road in the City of Lynnwood. Alternative 1 also includes storage tracks and an operator facility in the former Burlington Northern Santa Fe (BNSF) railroad corridor in the City of Bellevue, north of Northeast 12<sup>th</sup> Street.
- **Alternative 2 – BNSF:** The BNSF site is approximately 28 acres. The site is located south of State Route (SR) 520 and north of Northeast 12<sup>th</sup> Street on the east side of the former BNSF railway corridor, west of 120<sup>th</sup> Avenue Northeast in the City of Bellevue.

- **Alternative 3 – BNSF Modified:** the BNSF Modified site is approximately 35 acres. The site is located on the west and east side of the former BNSF railway corridor. It is located east of 116<sup>th</sup> Avenue Northeast and west of 120<sup>th</sup> Avenue Northeast; south of SR 520 and north of Northeast 12<sup>th</sup> Street in the City of Bellevue.
- **Alternative 4 – SR 520:** The SR 520 site is approximately 29 acres. The site is located in the City of Bellevue and is bounded by SR 520 to the north and Northup Way/Northeast 20<sup>th</sup> Street to the south. It is located east of 130<sup>th</sup> Avenue Northeast and west of 140<sup>th</sup> Avenue Northeast.

### **Proposed APE**

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Sincerely,



Elaine Wine  
Director, Operations and Program Management

Enclosure: APE Maps

cc: Dennis Lewarch, THPO, Suquamish Tribe  
Alison O'Sullivan, Natural Resources, Suquamish Tribe  
Matthew Sterner, Department of Archaeology and Historic Preservation  
Kent Hale, Sound Transit





U.S. Department  
of Transportation  
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206-220-7959 (fax)

April 3, 2013

Shelley Burch  
Tribal Chair  
Snoqualmie Tribe  
PO Box 969  
Snoqualmie, WA 98065

**Re: Sound Transit Link Operations and Maintenance Satellite Facility (OMSF)  
Request for Comments on Proposed Area of Potential Effects**

The Honorable Shelley Burch:

In a letter dated September 19, 2012, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Sound Transit Link Operations and Maintenance Satellite Facility (OMSF) project. Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. At this time, we respectfully seek your comments on the proposed APE.

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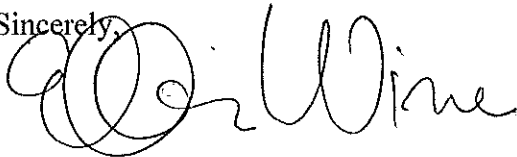
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Sincerely,



Elaine Wine  
Director, Operations and Program Management

Enclosure: APE Maps

cc: Steven Mullen, Cultural Resources, Snoqualmie Indian Tribe  
Cindy Spiry, Natural Resources, Snoqualmie Indian Tribe  
Matthew Sterner, Department of Archaeology and Historic Preservation  
Kent Hale, Sound Transit



U.S. Department  
of Transportation  
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206-220-7959 (fax)

April 3, 2013

Virginia Cross  
Tribal Chair  
Muckleshoot Indian Tribe  
39015 172nd Avenue SE  
Auburn, WA 98092

**Re: Sound Transit Link Operations and Maintenance Satellite Facility (OMSF)  
Request for Comments on Proposed Area of Potential Effects**

The Honorable Virginia Cross:

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Sincerely,



Elaine Wine  
Director, Operations and Program Management

Enclosure: APE Maps

cc:Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe  
Karen Walters, Fisheries Division, Muckleshoot Indian Tribe  
Matthew Sterner, Department of Archaeology and Historic Preservation  
Kent Hale, Sound Transit

**APE Concurrence Letter from DAHP**  
**April 25, 2013**

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Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

SS  
AC-cover  
✓scan

April 25, 2013

Mr. Steve Saxton  
Federal Transit Administration  
915 2nd Avenue  
Federal Building, Suite 3142  
Seattle, WA 98174-1002

In future correspondence please refer to:  
Log: 100912-02-FTA  
Property: Sound Transit Link Operations and Maintenance Satellite Facility  
Re: Archaeology - APE Concur

Dear Mr. Saxton:

We have reviewed the materials forwarded to our office for the proposed Sound Transit Link Operations and Maintenance Satellite Facility project. Thank you for your description of the area of potential effect (APE) for the project. We concur with the definition of the APE. We look forward to the results of your cultural resources survey efforts, your consultation with the concerned tribes, and receiving the survey report. We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4) and the survey report when it is available.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised.

Please note that DAHP requires that all historic property inventory and archaeological site forms be provided to our office electronically. If you have not registered for a copy of the database, please log onto our website at [www.dahp.wa.gov](http://www.dahp.wa.gov) and go to the Survey/Inventory page for more information and a registration form. To assist you in conducting a survey, DAHP has developed a set of cultural resource reporting guidelines. You can obtain a copy of these guidelines from our website. Also, please note that DAHP requires that all cultural resource reports be submitted in PDF format on a labeled CD or electronically. For further information please go to [http://www.dahp.wa.gov/documents/CR\\_ReportPDF\\_Requirement.pdf](http://www.dahp.wa.gov/documents/CR_ReportPDF_Requirement.pdf).

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,

Matthew Sterner, M.A.  
Transportation Archaeologist  
(360) 586-3082  
[matthew.sterner@dahp.wa.gov](mailto:matthew.sterner@dahp.wa.gov)

APR 29 2013 PM 1:04





**Request for Concurrence with Eligibility Determinations**  
**July 24, 2013**

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U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION X  
Alaska, Idaho, Oregon,  
Washington

915 Second Avenue  
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Seattle, WA 98174-1002  
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206-220-7959 (fax)

July 24, 2013

Matthew Sterner  
Transportation Archaeologist  
Department of Archaeology and Historic Preservation  
PO Box 48343  
Olympia, WA 98504-8343

**Re: Sound Transit Link Operations and Maintenance Satellite Facility (OMSF)  
DAHP Log: 100912-02-FTA  
Request for Concurrence with Eligibility Determinations**

Dear Mr. Sterner:

Thank you for your letter dated April 25, 2012 concurring with the Area of Potential Effect (APE) for the Sound Transit Link Operation and Maintenance Satellite Facility (OMSF) project, log number 100912-02-FTA. Since your letter, the Federal Transit Administration (FTA) and Sound Transit have completed a historic property inventory (HPI) for the project. At this time, we seek your comments and concurrence on and proposed eligibility determinations for historic properties identified in the project APE.

**Project Background**

As described in the September 19, 2012 and the April 3, 2013 letters from FTA, the project seeks to evaluate alternatives for a new OMSF to serve the increased light rail fleet needed to implement the regional light rail system expansion. Four alternatives located in the cities of Lynnwood and Bellevue have been identified for evaluation in an Environmental Impact Statement (EIS). The project APE includes the area within the boundaries of the OMSF site alternatives, the area within 200 feet of the boundaries of OMSF site alternatives, and any ancillary facilities constructed as part of the project.

**Historic Property Inventory (HPI)**

ICF International (ICF), on behalf of Sound Transit, completed an HPI of the project APE. All properties within the APE are identified in the enclosed figures and tables. To capture properties which will become 50 years old through the course of the site development and construction, all properties within the APE which were 45 years old or older were evaluated for eligibility for listing in the National Register of Historic Places (NRHP). Properties less than 45 years old were not evaluated.



Due to the proximity of the OMSF alternatives to the Sound Transit Lynnwood Link (log number 100611-07-FTA) and East Link (log number 1090806-11-FTA) projects, all properties 45 years old or more, with the exception of one, have been previously evaluated by FTA and the Washington Department of Archaeology and Historic Preservation (DAHP). All previously evaluated properties were determined not eligible for listing in the NRHP by FTA and DAHP. Table 1 lists the properties within the OMSF APE which were previously evaluated. The table includes the previous eligibility determination, the log number of the project each property was evaluated under, and the field site or Smithsonian number. As the eligibility determinations for these properties occurred less than ten years ago, FTA finds that the previous determinations are still accurate and do not require additional evaluation.

As indicated in Table 3 and Figure 2, a segment of the Northern Pacific Railway Lake Washington Beltline travels through the OMSF APE. This segment of the railway was previously evaluated as part of the Sound Transit East Link project, field site number 1256-409 and temporary designation number 1256-1. FTA found that the segment of the railway was not eligible for the NRHP and requested DAHP's concurrence with a 'Not Eligible' determination in the letter dated November 23, 2010. DAHP responded in a letter dated November 23, 2010 requesting a trinomial for the site which FTA provided in the letter dated March 28, 2011. FTA also provided DAHP a copy of the 2011 East Link Cultural Resources Technical Report which found that the railway segment is not eligible.

After completing a literature review for the OMSF project, it was found that the HPI form in DAHP's database, WISAARD, lists the eligibility status for the Northern Pacific Railway Lake Washington Beltline segment as 'Not Determined' (HPI with field site number 1256-409). FTA maintains its previous finding that the Northern Pacific Railway Lake Washington Beltline segment within the OMSF APE is not eligible for listing in the NRHP.

The International Paper Company, located at 1899 120<sup>th</sup> Avenue in Bellevue, is the only property older than 45 years in the project APE that has not been previously evaluated for eligibility. As described in the enclosed HPI form, the building was originally constructed in 1967 by Wester Paper as a corrugated container plant. The building exhibits an industrial utilitarian design with a modernist style façade at the building entrance. The building does not appear to embody the characteristics or method of construction that would warrant special recognition. There is also no evidence that the building is associated with significant events, lives of persons significant in the community, or any significant designers or craftsmen. Additionally, the building does not have the potential to be a principal source of historical information based on its common construction and building type.

#### **Request for Concurrence**

**Based on this information, FTA finds that the International Paper Company property is not eligible for listing in the NRHP. As less than ten years has lapsed since the previous evaluation of the other properties within the OMSF project APE, FTA also finds that the previous eligibility determinations remain valid. Pursuant to Section 106 of the National Historic Preservation Act, FTA requests your concurrence with these findings.**

To assist your review, please the following items are enclosed with this letter:

- Table 1 - Previously Evaluated Buildings and Structures (listing only those properties in the APE that meet the age criteria and have been previously evaluated by FTA and DAHP)
- Figures 1 and 2 - Project Area Buildings and Structures Maps (a map of the APE for each OMSF alternative, with parcel specific Map Identification numbers that correspond to the associated tables that follow)
- Tables 2, 3, and 4 - Project Area Buildings and Structures Tables (tables that identify ALL properties in the APE, noting which meet the age criteria and whether they have been previously evaluated for NRHP eligibility)
- International Paper Company HPI Form (this form has been entered into DAHPs database as a DRAFT form)

Please note that the APE for OMSF Alternative 4 (SR 520) has 54 buildings but none meet the age criteria. Accordingly, the enclosures include a table of properties (Table 4), but no corresponding map for this site alternative.

Sound Transit and FTA are in the process of preparing a Cultural Resources Technical Report for the project. The report and a proposed determination of effects will be submitted to you prior to publication of the Draft Environmental Impact Statement (DEIS).

We look forward to your response on the proposed eligibility findings. If you have questions or need additional information, please contact Steve Saxton, FTA, at (206) 220-4311 or by email [James.Saxton@dot.gov](mailto:James.Saxton@dot.gov) or Kent Hale, Sound Transit, by phone at (206) 398-5103 or by email at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org). Thank you for your assistance.

Sincerely,



Elaine Wine

Director, Operations and Program Management Office

Enclosure:   Previously Evaluated Buildings and Structures (Table 1)  
                  Project Area Buildings and Structures Maps (Figures 1 & 2)  
                  Project Area Buildings and Structures Tables (Tables 2, 3, & 4)  
                  International Paper Company HPI Form

cc: Kent Hale, Sound Transit



**DAHP Concurrence with Eligibility Determinations**  
**August 22, 2013**

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Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

August 22, 2013

Mr. James Saxton  
Federal Transit Administration  
915 2nd Avenue  
Federal Building, Suite 3142  
Seattle, WA 98174-1002

In future correspondence please refer to:

Log: 100912-02-FTA

Property: Sound Transit Link Operations and Maintenance Satellite Facility

Re: NOT Eligible

Dear Mr. Saxton:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). I have reviewed the Sound Transit Link Operations and Maintenance Satellite Facility project on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication dated July 24, 2013.

Research indicates that various resources within the APE of the project have been surveyed as part of other projects. None were determined eligible. For this project, one new property has been found at 1899 120<sup>th</sup> Ave NE, Bellevue. I concur that this property is NOT ELIGIBLE for the National Register of Historic Places. As a result of this finding, further contact with DAHP is not necessary. However, if additional information on the property becomes available, or if any archaeological resources are uncovered during construction, please halt work in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

Thank you for the opportunity to review and comment. Should you have any questions, please contact me.

Sincerely,

**Michael Houser**  
*State Architectural Historian*  
(360) 586-3076  
[michael.houser@dahp.wa.gov](mailto:michael.houser@dahp.wa.gov)







# **Request for Comments on the Draft Cultural Resources Reports November 26, 2013**

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- DAHP
- Duwamish
- Muckleshoot
- Snohomish
- Snoqualmie
- Suquamish
- Tulalip
- Yakama





U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION X  
Alaska, Idaho, Oregon,  
Washington

915 Second Avenue  
Federal Bldg. Suite 3142  
Seattle, WA 98174-1002  
206-220-7954  
206-220-7959 (fax)

November 26, 2013

Matthew Sterner  
State Historic Preservation Officer  
Department of Archaeology and Historic Preservation  
PO Box 48343  
Olympia, WA 98504-8343

**Re: Sound Transit Link Operations and Maintenance Satellite Facility Project  
DAHP Log: 100912-02-FTA, Preliminary Draft Cultural Resources Technical Report**

Dear Mr. Sterner:

In a letter dated September 19, 2012, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Sound Transit Link Operations and Maintenance Satellite Facility (OMSF). Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS), developed a proposed Area of Potential Effect (APE), and evaluated historic properties in the project APE for eligibility in the National Register of Historic Places. FTA requested your concurrence with the APE in April 2013 and with the eligibility determinations in July 2013.

In accordance with Section 106 of the National Historic Preservation Act and as a part of our continuing consultation, FTA submits to you for your review and comment the preliminary Draft Cultural Resources Technical Report for the Draft EIS. Chapters 1 (Purpose and Need for the Project) and 2 (Alternatives Considered) of the preliminary Draft EIS, also included, describe the project background and alternatives evaluated.

Your comments on the preliminary Draft Cultural Resources Technical Report are requested by January 3, 2013. If you have any questions, please Steve Saxton, FTA Region 10, at 206-220-4465 or [james.saxton@dot.gov](mailto:james.saxton@dot.gov) or Kent Hale, Sound Transit, at (206) 398-5103 or at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,

Kenneth A. Feldman  
Deputy Regional Administrator

Enclosures: Preliminary Draft Cultural Resources Report, Preliminary Draft EIS Chapters 1 & 2

cc: Kent Hale, Sound Transit



U.S. Department  
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**Federal Transit  
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November 26, 2013

Harry Smiskin  
Tribal Chair  
Confederated Tribes and Bands of the Yakama Indian Nation  
PO Box 151  
Toppenish, WA 98948

**Re: Sound Transit Link Operations and Maintenance Satellite Facility  
Cultural Resources Technical Report & Ecosystems Technical Report**

The Honorable Harry Smiskin:

In a letter dated September 19, 2012, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Sound Transit Link Operations and Maintenance Satellite Facility (OMSF). Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2013 FTA invited the tribe's comments on the APE.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, FTA submits to you for review and comment the preliminary Draft Cultural Resources Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. Chapters 1 (Purpose and Need for the Project) and 2 (Alternatives Considered) of the preliminary Draft EIS, also included, describe the project background and alternatives evaluated.

Your comments are requested by January 3, 2013. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or [james.saxton@dot.gov](mailto:james.saxton@dot.gov) or Kent Hale, Sound Transit, at (206) 398-5103 or at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,

R.F. Krochalis  
Regional Administrator

Enclosures: Preliminary Draft Cultural Resources Report  
Preliminary Draft Ecosystems Technical Report  
Preliminary Draft EIS Chapters 1 & 2

cc (by email): Johnson Meninick, Cultural Resources, Confederated Tribes and Bands of the Yakama Indian Reservation  
Philip Ridgon, Natural Resources, Confederated Tribes and Bands of the Yakama Indian Reservation  
Matthew Sterner, Department of Archaeology and Historic Preservation  
Kent Hale, Sound Transit



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November 26, 2013

Melvin Sheldon, Jr.  
Tribal Chair  
Tulalip Tribes of Washington  
6406 Marine Drive Northwest  
Tulalip, WA 98271

**Re: Sound Transit Link Operations and Maintenance Satellite Facility  
Cultural Resources Technical Report & Ecosystems Technical Report**

The Honorable Melvin Sheldon, Jr.:

In a letter dated September 19, 2012, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Sound Transit Link Operations and Maintenance Satellite Facility (OMSF). Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2013 FTA invited the tribe's comments on the APE.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, FTA submits to you for review and comment the preliminary Draft Cultural Resources Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. Chapters 1 (Purpose and Need for the Project) and 2 (Alternatives Considered) of the preliminary Draft EIS, also included, describe the project background and alternatives evaluated.

Your comments are requested by January 3, 2013. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or [james.saxton@dot.gov](mailto:james.saxton@dot.gov) or Kent Hale, Sound Transit, at (206) 398-5103 or at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,

R.F. Krochalis  
Regional Administrator

Enclosures: Preliminary Draft Cultural Resources Report  
Preliminary Draft Ecosystems Technical Report  
Preliminary Draft EIS Chapters 1 & 2

cc (by email): Richard Young, Cultural Resources, Tulalip Tribes of Washington  
Kurt Nelson, Natural Resources, Tulalip Tribes of Washington  
Matthew Sterner, Department of Archaeology and Historic Preservation  
Kent Hale, Sound Transit





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November 26, 2013

Leonard Forsman  
Tribal Chair  
Suquamish Indian Tribe of the Port Madison Reservation  
PO Box 498  
Suquamish, WA 98392-0498

**Re: Sound Transit Link Operations and Maintenance Satellite Facility  
Cultural Resources Technical Report & Ecosystems Technical Report**

The Honorable Leonard Forsman:

In a letter dated September 19, 2012, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Sound Transit Link Operations and Maintenance Satellite Facility (OMSF). Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2013 FTA invited the tribe's comments on the APE.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, FTA submits to you for review and comment the preliminary Draft Cultural Resources Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. Chapters 1 (Purpose and Need for the Project) and 2 (Alternatives Considered) of the preliminary Draft EIS, also included, describe the project background and alternatives evaluated.

Your comments are requested by January 3, 2013. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or [james.saxton@dot.gov](mailto:james.saxton@dot.gov) or Kent Hale, Sound Transit, at (206) 398-5103 or at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,

R.F. Krochalis  
Regional Administrator

Enclosures: Preliminary Draft Cultural Resources Report  
Preliminary Draft Ecosystems Technical Report  
Preliminary Draft EIS Chapters 1 & 2

cc (by email): Dennis Lewarch, THPO, Suquamish Tribe  
Alison O'Sullivan, Natural Resources, Suquamish Tribe  
Matthew Sterner, Department of Archaeology and Historic Preservation  
Kent Hale, Sound Transit



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November 26, 2013

Carolyn Lubenau  
Tribal Chair  
Snoqualmie Indian Tribe  
PO Box 969  
Snoqualmie, WA 98065

**Re: Sound Transit Link Operations and Maintenance Satellite Facility  
Cultural Resources Technical Report & Ecosystems Technical Report**

The Honorable Carolyn Lubenau:

In a letter dated September 19, 2012, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Sound Transit Link Operations and Maintenance Satellite Facility (OMSF). Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2013 FTA invited the tribe's comments on the APE.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, FTA submits to you for review and comment the preliminary Draft Cultural Resources Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. Chapters 1 (Purpose and Need for the Project) and 2 (Alternatives Considered) of the preliminary Draft EIS, also included, describe the project background and alternatives evaluated.

Your comments are requested by January 3, 2013. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or [james.saxton@dot.gov](mailto:james.saxton@dot.gov) or Kent Hale, Sound Transit, at (206) 398-5103 or at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,

R.F. Krochalis  
Regional Administrator

Enclosures: Preliminary Draft Cultural Resources Report  
Preliminary Draft Ecosystems Technical Report  
Preliminary Draft EIS Chapters 1 & 2

cc (by email): Steven Mullen, Cultural Resources, Snoqualmie Indian Tribe  
Cindy Spiry, Natural Resources, Snoqualmie Indian Tribe  
Matthew Sterner, Department of Archaeology and Historic Preservation  
Kent Hale, Sound Transit



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206-220-7959 (fax)

November 26, 2013

Virginia Cross  
Tribal Chair  
Muckleshoot Indian Tribe  
39015 172nd Avenue SE  
Auburn, WA 98092

**Re: Sound Transit Link Operations and Maintenance Satellite Facility  
Cultural Resources Technical Report & Ecosystems Technical Report**

The Honorable Virginia Cross:

In a letter dated September 19, 2012, the Federal Transit Administration (FTA) initiated consultation under Section 106 of the National Historic Preservation Act for the Sound Transit Link Operations and Maintenance Satellite Facility (OMSF). Since the initiation of consultation, FTA and Sound Transit have identified alternatives for study in the Environmental Impact Statement (EIS) and developed a proposed Area of Potential Effect (APE) for the project. In April 2013 FTA invited the tribe's comments on the APE.

In accordance with Section 106 of the National Historic Preservation Act and as part of our continuing consultation, FTA submits to you for review and comment the preliminary Draft Cultural Resources Technical Report that is being prepared for the Draft EIS. In addition, we are also providing the preliminary Draft Ecosystems Technical Report for your review and comment. Chapters 1 (Purpose and Need for the Project) and 2 (Alternatives Considered) of the preliminary Draft EIS, also included, describe the project background and alternatives evaluated.

Your comments are requested by January 23, 2013. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact Steve Saxton, FTA Region 10, at 206-220-4465 or [james.saxton@dot.gov](mailto:james.saxton@dot.gov) or Kent Hale, Sound Transit, at (206) 398-5103 or at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,

R.F. Krochalis  
Regional Administrator

Enclosures: Preliminary Draft Cultural Resources Report  
Preliminary Draft Ecosystems Technical Report  
Preliminary Draft EIS Chapters 1 & 2

cc (by email): Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe  
Karen Walters, Fisheries Division, Muckleshoot Indian Tribe  
Matthew Sterner, Department of Archaeology and Historic Preservation  
Kent Hale, Sound Transit



November 13, 2013

Michael Evans, Tribal Chair  
Snohomish Tribe  
11014 19th Avenue SE, Ste. #8, PMP #101  
Everett, WA 98208-5121

Re: Sound Transit Link Operations and Maintenance Satellite Facility  
Cultural Resources Technical Report & Ecosystems Technical Report

Dear Chair Evans:

Sound Transit initiated consultation Snohomish Tribe in September 2012 for preparation of an Environmental Impact Statement (EIS) for the proposed Operations and Maintenance Satellite Facility (OMSF), pursuant to the National Environmental Policy Act (NEPA). Since the initiation of consultation, Sound Transit has identified alternatives for study in the EIS and developed a proposed Area of Potential Effect (APE) for the project. In April 2013 Sound Transit invited the tribe's comments on the APE.

In accordance with Section 106 of the National Historic Preservation Act, as amended (16 U.S.C 470f), and implementing regulations 36 CFR 800.6(a)(1) and as part of continuing consultation, Sound Transit submits to you for review and comment the preliminary Draft Cultural Resources Technical Report that is being prepared for the Draft EIS. In addition, we are providing the preliminary Draft Ecosystems Technical Report for your review and comment. Chapters 1 (Purpose and Need for the Project) and 2 (Alternatives Considered) of the preliminary Draft EIS, also included, describe the project background and alternatives evaluated.

Your comments are requested by December 13, 2013. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact me at (206) 398-5103 or at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,

Kent Hale  
Senior Environmental Planner

Enclosures: Preliminary Draft Cultural Resources Technical Report  
Preliminary Draft Ecosystems Technical Report  
Preliminary Draft EIS Chapters 1 & 2

Cc (by email): Steve Saxton, Federal Transit Administration  
Matthew Sterner, Department of Archaeology and Historic Preservation

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*Pierce County Executive*

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**Peter von Reichbauer**  
*King County Councilmember*

**CHIEF EXECUTIVE OFFICER**  
**Joni Earl**



November 13, 2013

Cecile A. Hansen, Tribal Chair  
Duwamish Tribe  
4705 W Marginal Way SW  
Seattle, WA 98106

Re: Sound Transit Link Operations and Maintenance Satellite Facility  
Cultural Resources Technical Report & Ecosystems Technical Report

Dear Chair Hansen:

Sound Transit initiated consultation Duwamish Tribe in September 2012 for preparation of an Environmental Impact Statement (EIS) for the proposed Operations and Maintenance Satellite Facility (OMSF) project, pursuant to the National Environmental Policy Act (NEPA). Since the initiation of consultation, Sound Transit has identified alternatives for study in the EIS and developed a proposed Area of Potential Effect (APE) for the project. In April 2013 Sound Transit invited the tribe's comments on the APE.

In accordance with Section 106 of the National Historic Preservation Act, as amended (16 U.S.C 470f), and implementing regulations 36 CFR 800.6(a)(1) and as part of continuing consultation, Sound Transit submits to you for review and comment the preliminary Draft Cultural Resources Technical Report that is being prepared for the Draft EIS. In addition, we are providing the preliminary Draft Ecosystems Technical Report for your review and comment. Chapters 1 (Purpose and Need for the Project) and 2 (Alternatives Considered) of the preliminary Draft EIS, also included, describe the project background and alternatives evaluated.

Your comments are requested by December 13, 2013. We will follow up in the coming weeks to schedule a meeting about the project if you are interested in doing so. If you have any questions, please contact me at (206) 398-5103 or at [kent.hale@soundtransit.org](mailto:kent.hale@soundtransit.org).

Sincerely,

Kent Hale  
Senior Environmental Planner

Enclosures: Preliminary Draft Cultural Resources Technical Report  
Preliminary Draft Ecosystems Technical Report  
Preliminary Draft EIS Chapters 1 & 2

Cc (by email): Steve Saxton, Federal Transit Administration  
Matthew Sterner, Department of Archaeology and Historic Preservation

**CHAIR**

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*Pierce County Executive*

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*Seattle Mayor*

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*Lakewood Councilmember*

**Lynn Peterson**  
*Washington State Secretary of Transportation*

**Larry Phillips**  
*King County Councilmember*

**Marilyn Strickland**  
*Tacoma Mayor*

**Peter von Reichbauer**  
*King County Councilmember*

**CHIEF EXECUTIVE OFFICER**  
**Joni Earl**

**DAHP Comments on the Draft  
Cultural Resources Technical Report  
December 30, 2013**

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December 30, 2013

Mr. Dan Drais  
Federal Transit Administration  
915 2nd Avenue  
Federal Building, Suite 3142  
Seattle, WA 98174-1002

In future correspondence please refer to:

Log: 100912-02-FTA

Property: Sound Transit Link Operations and Maintenance Satellite Facility

Re: Receipt of Draft Cultural Resources Technical Report

Dear Mr. Drais:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) and providing a copy of the draft Cultural Resources Technical report completed by ICF International. The report has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

Overall, the report is comprehensive and well presented. My sole comment would be with the wording of the "recommendations" presented on page 8-1 that states, "A finding of 'no historic properties affected' is recommended for the proposed project under Section 106 of the NHPA." Since no archaeological investigation was undertaken for the study, this statement is presented prematurely. The paragraph following this statement does express a strategy for continuing the archaeological investigations as the project proceeds, a strategy that our agency can concur with. However, since this investigation is incomplete, my statements regarding the effect determination under Section 106 remain.

Thank you for the opportunity to review and comment.

Sincerely,



Matthew Sterner, M.A.  
Transportation Archaeologist  
(360) 586-3082  
matthew.sterner@dahp.wa.gov



